Form 1-N Page 1 Execution Page	**U.S. SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549 FORM AND AMENDMENTS FOR NOTICE OF REGISTRATION AS A NATIONAL SECURITIES EXCHANGE FOR THE SOLE PURPOSE OF TRADING SECURITY FUTURES PRODUCTS PURSUANT TO SECTION 6(g) OF THE EXCHANGE ACT**	Date filed (MM/DD/YY): 04/10/26

WARNING: Failure to keep this form current and to file accurate supplementary information on a timely basis, or the failure to keep accurate books and records or otherwise to comply with the provisions of law applying to the conduct of a national securities exchange would violate the federal securities laws and may result in disciplinary, administrative or criminal action.

INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS

☑ APPLICATION ☐ AMENDMENT

1. State the name of the exchange: Chicago Mercantile Exchange Inc.

2. Provide the Security Futures Product Exchange's primary street address (Do not use a P.O. Box):
20 South Wacker Drive, Chicago, Illinois 60606

3. Provide the exchange's mailing address (if different):

4. Provide the business telephone and facsimile number:
(312) 930-1000 (Telephone) N/A (Facsimile)

5. Provide the name, title and telephone number of a contact employee:
Maureen Guilfoile (Name) | MD Chief Regulatory Counsel (Title) | (312) 930-8141 (Telephone Number)

6. Provide the name and address of counsel for the exchange:
Jonathan Marcus
20 South Wacker Drive, Chicago, Illinois 60606

7. Provide the date that the exchange's fiscal year ends: December 31

8. Indicate legal status of the exchange: ☑ Corporation ☐ Sole Proprietorship ☐ Partnership ☐ Limited Liability Company ☐ Other (specify):

If other than a sole proprietor, indicate the date and place where the exchange obtained its legal status (e.g., state where incorporated, place where partnership agreement was filed, or where the Security Futures Product Exchange entity was formed):
(a) Date (MM/DD/YY): 12/30/99 (b) State/Country of formation: Delaware/United States of America
(c) Statute under which the exchange was organized: General Corporation Law of Delaware

EXECUTION:

The exchange consents that service of any civil action brought by or notice of any proceeding before the Securities and Exchange Commission in connection with the exchange's activities may be given by registered or certified mail or confirmed telegram to the exchange's contact employee at the main address, or mailing address if different, given in Items 2 and 3. The undersigned, being first duly sworn, deposes and says that he/she has executed this form on behalf of, and with the authority of, said exchange. The undersigned and the exchange represent that the information and statements contained herein, including exhibits, schedules, or other documents attached hereto, and other information filed herewith, all of which are made a part hereof, are current, true, and complete.

Date: 04/09/26 (MM/DD/YY) Chicago Mercantile Exchange Inc. (Name of Exchange)

By: Maureen Guilfoile (Signature) Maureen Guilfoile, MD Chief Regulatory Counsel (Printed Name and Title)

Subscribed and sworn before me this 9th day of April (Month), 2026 (Year) by [signature] (Notary Public)

My Commission expires 9.4.28 County of Cook State of Illinois

Official Seal
MICHAEL E BAER
Notary Public, State of Illinois
Commission No. 841022
My Commission Expires September 4, 2028

This page must always be completed in full with original, manual signature and notarization.
Affix notary stamp or seal where applicable.

DO NOT WRITE BELOW THIS LINE - FOR OFFICIAL USE ONLY

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit A

EXHIBIT A

Exhibit Request:

As of the latest date practicable within one (1) month of the date Form 1-N is filed, a copy of the constitution, articles of incorporation or association with all subsequent amendments, and existing by-laws or corresponding rules or instruments, whatever the name, of the filing exchange.

Response:

Please find attached the Restated Certificate of Incorporation of Chicago Mercantile Exchange Inc. as **Exhibit A-1** and the Amended and Restated By-Laws of Chicago Mercantile Exchange Inc. Amended and Restated as of August 26, 2021, as **Exhibit A-2**.

Exhibit A-1

RESTATED
CERTIFICATE OF INCORPORATION
OF
CHICAGO MERCANTILE EXCHANGE INC.

The undersigned, Craig S. Donohue, certifies that he is the Chief Executive Officer of Chicago Mercantile Exchange Inc., a corporation organized and existing under the laws of the State of Delaware (the "Corporation"), and does hereby further certify as follows:

(1) The name of the Corporation is Chicago Mercantile Exchange Inc.

(2) The name under which the Corporation was originally incorporated was Chicago Mercantile Exchange Inc. and the original Certificate of Incorporation was filed with the Secretary of State of the State of Delaware on December 30, 1999.

(3) This Restated Certificate of Incorporation was duly adopted in accordance with the provisions of Sections 242 and 245 of the General Corporation Law of the State of Delaware.

(4) This Restated Certificate of Incorporation amends paragraph (3) of Article Fifth and restates the Certificate of Incorporation to read in its entirety, as follows:

FIRST

The name of the Corporation is Chicago Mercantile Exchange Inc. (hereinafter the "Corporation").

SECOND

The address of the registered office of the Corporation in the State of Delaware is 1209 Orange Street, in the City of Wilmington, County of New Castle, Delaware 19801. The name of its registered agent at that address is The Corporation Trust Company.

THIRD

The purpose of the Corporation is to engage in any lawful act or activity for which a corporation may be organized under the General Corporation Law of the State of Delaware as set forth in Title 8 of the Delaware Code (the "DGCL").

FOURTH

The total number of shares of stock which the Corporation shall have authority to issue is One Thousand (1000) shares of Common Stock, each having a par value of one cent ($.01).

FIFTH

The following provisions are inserted for the management of the business and the conduct of the affairs of the Corporation, and for further definition, limitation and regulation of the powers of the Corporation and of its Board of Directors and shareholders:

(1) The business and affairs of the Corporation shall be managed by or under the direction of the Board of Directors.

(2) The Board of Directors shall have concurrent power with the shareholders to make, alter, amend, change, add to or repeal the By Laws of the Corporation.

(3) The number of directors of the Corporation shall be as from time to time fixed by, or in the manner provided in, the By Laws of the Corporation. Election of directors need not be by written ballot unless the By Laws so provide. The Board of Directors of the Corporation shall at all times be comprised of the same directors as those of Chicago Mercantile Exchange Holdings Inc., the sole stockholder of the Corporation; provided, however, that any director that is suspended or expelled from membership of the Corporation shall automatically be removed from the Board of Directors of the Corporation.

(4) No director shall be personally liable to the Corporation or any of its shareholders for monetary damages for breach of fiduciary duty as a director, except for liability (i) for any breach of the director's duty of loyalty to the Corporation or its shareholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (iii) pursuant to Section 174 of the DGCL or (iv) for any transaction from which the director derived an improper personal benefit. Any repeal or modification of this Article FIFTH by the shareholders of the Corporation shall not adversely affect any right or protection of a director of the Corporation existing at the time of such repeal or modification with respect to acts or omissions occurring prior to such repeal or modification.

(5) In addition to the powers and authority hereinbefore or by statute expressly conferred upon them, the directors are hereby empowered to exercise all such powers and do all such acts and things as may be exercised or done by the Corporation, subject, nevertheless, to the provisions of the DGCL, this Restated Certificate of Incorporation, and any By Laws adopted by the shareholders; provided, however, that no By Laws hereafter adopted by the shareholders shall invalidate any prior act of the directors which would have been valid if such By Laws had not been adopted.

SIXTH

Meetings of shareholders may be held within or without the State of Delaware, as the By Laws may provide. The books of the Corporation may be kept (subject to any provision contained in the DGCL) outside the State of Delaware at such place or places as may be designated from time to time by the Board of Directors or in the By Laws of the Corporation.

SEVENTH

The Corporation reserves the right to amend, alter, change or repeal any provision contained in this Restated Certificate of Incorporation, in the manner now or hereafter prescribed by statute, and all rights conferred upon shareholders herein are granted subject to this reservation.

I, THE UNDERSIGNED, being an officer of the Corporation, do make this Certificate, hereby declaring and certifying that this is my act and deed and the facts stated herein are true, and accordingly have hereunto set my hand this __ day of April, 2004

Exhibit A-2

AMENDED AND RESTATED BY-LAWS
OF
CHICAGO MERCANTILE EXCHANGE INC.

Amended and Restated as of August 26, 2021

ARTICLE I

Section 1.1. Annual Meetings.

(a) The annual meetings of stockholders shall be held on such date, at such time and at such place, either within or without the state of Delaware, as shall be designated from time to time by the Board of Directors and stated in the notice of the meeting. Subject to paragraph (b) of this Section 1.1, any other proper business may be transacted at an annual meeting.

(b) At the annual meetings the stockholders shall elect the Board of Directors, which Directors shall at all times be comprised of the same Directors as those of CME Group Inc., the sole stockholder of the Corporation and transact such other business as may properly be brought before the meeting. For such business to be properly brought before the meeting, it must be: (i) authorized by the Board of Directors and specified in the notice, or a supplemental notice, of the meeting, (ii) otherwise brought before the meeting by or at the direction of the Board of Directors or the chairman of the meeting, or (iii) otherwise properly brought before the meeting by a stockholder.

Section 1.2. Special Meetings.

Special meetings of stockholders for any purpose or purposes may be called at any time only by the Chairman of the Board or by a majority of the total number of authorized Directors. The business transacted at a special meeting of stockholders shall be limited to the purpose or purposes for which such meeting is called.

Section 1.3. Notice of Meetings.

Written notice of the place, date, and time of all meetings of the stockholders shall be given, not less than ten (10) nor more than sixty (60) days before the date on which the meeting is to be held, to each stockholder entitled to vote at such meeting, except as otherwise provided herein or required by law (meaning, here and hereinafter, as required from time to time by the DGCL or the Certificate of Incorporation of the Corporation). The notice of any special meeting of stockholders shall also state the purpose or purposes for which such meeting is called.

Section 1.4. Adjournments.

Any annual or special meeting of stockholders may be adjourned from time to time to reconvene at the same or some other place. When a meeting is adjourned to another time or place, notice need not be given of the adjourned meeting if the time and place, if any, thereof, and the means of remote communications, if any, by which stockholders and proxy holders may be deemed to be present in person and vote at such adjourned meeting is announced at the meeting at which the adjournment is taken; provided, however, that if the date of any adjourned meeting is more than thirty (30) days after the date for which the meeting was originally noticed, or if a new record date is fixed for the adjourned meeting, notice of the place, if any, date, and time of the adjourned meeting and the means of remote communications, if any, by which

stockholders and proxy holders may be deemed to be present in person and vote at such adjourned meeting shall be given in conformity herewith. At any adjourned meeting, any business may be transacted which might have been transacted at the original meeting without regard to the presence of a quorum at such adjournment.

Section 1.5. Quorum.

Except as otherwise provided by law, the Certificate of Incorporation or these By-laws, the presence in person or by proxy of the holders of stock having not less than one-third of the votes which could be cast by the holders of all outstanding stock entitled to vote at the meeting shall constitute a quorum at each meeting of stockholders. In the absence of a quorum, then either (i) the chairman of the meeting or (ii) the stockholders may, by the affirmative vote of the holders of stock having a majority of the votes which could be cast by all such holders, adjourn the meeting from time to time in the manner provided in Section 1.4 of these By-laws until a quorum is present. If a quorum is present when a meeting is convened, the subsequent withdrawal of stockholders, even though less than a quorum remains, shall not affect the ability of the remaining stockholders lawfully to transact business.

Section 1.6. Organization.

Meetings of stockholders shall be presided over by the Chairman of the Board or the Chief Executive Officer (in that order), or in their absence, inability or unwillingness, by a chairman designated by the Board of Directors, or in the absence of such designation, by a chairman chosen at the meeting. The Secretary shall act as secretary of the meeting, but in his or her absence, the chairman of the meeting may appoint any person to act as secretary of the meeting. The chairman of any meeting of the stockholders shall determine the order of business and the procedure at the meeting, including such regulation of the manner of voting and the conduct of business.

Section 1.7. Proxies and Voting.

At any meeting of the stockholders, every stockholder entitled to vote may vote in person or by proxy authorized by an instrument in writing or by a transmission permitted by law filed in accordance with the procedure established for the meeting. Any copy, facsimile telecommunication or other reliable reproduction of the writing or transmission created pursuant to this paragraph may be substituted or used in lieu of the original writing or transmission for any and all purposes for which the original writing or transmission could be used, provided that such copy, facsimile telecommunication or other reproduction shall be a complete reproduction of the entire original writing or transmission.

Section 1.8. Fixing Date of Determination of Stockholders of Record.

(a) In order that the Corporation may determine the stockholders entitled (i) to notice of or to vote at any meeting of stockholders or any adjournment thereof, (ii) to receive payment of any dividend or other distribution or allotment of any rights, (iii) to exercise any rights in respect of any change, conversion or exchange of stock or (iv) to take, receive or participate in any other action, the Board of Directors may fix a record date, which shall not be earlier than the date upon which the resolution fixing the record date is adopted by the Board of Directors and which (1) in the case of a determination of stockholders entitled to notice of or to vote at any meeting of stockholders or adjournment thereof, shall, unless otherwise required by law, be not more than 60 nor less than 10 days before the date of such meeting; and (2) in the case of any other action, shall be not more than 60 days before such action.

(b) If no record date is fixed, (i) the record date for determining stockholders entitled to notice of or to vote at a meeting of stockholders shall be at the close of business on the day next preceding the day on which notice is given, or, if notice is waived, at the close of business on the day next preceding the day on which the meeting is held; and (ii) the record date for determining stockholders for any other purpose shall be at the close of business on the day on which the Board of Directors adopts the resolution relating thereto.

(c) A determination of stockholders of record entitled to notice of or to vote at a meeting of stockholders shall apply to any adjournment of the meeting, but the Board of Directors may fix a new record date for the adjourned meeting.

ARTICLE II

Section 2.1. Number; Qualifications.

The Board of Directors shall consist of the number of Directors as from time to time fixed by the Board of Directors, provided that the Board of Directors shall at all times be comprised of the same Directors as those of CME Group Inc., the sole stockholder of the Corporation, and no person shall serve as a Director unless he or she meets the requirements, if any, provided in the Certificate of Incorporation for service on the Board of Directors.

Section 2.2. Election; Resignation; Vacancies.

(a) Subject to the provisions of the Certificate of Incorporation and Section 1.1(b) of these By-laws, at each annual meeting of stockholders, the stockholders shall elect, pursuant to the terms of the Certificate of Incorporation, the successors to the Directors whose terms expire at that meeting, and each Director shall hold office until the annual meeting at which such Director's term expires and the election and qualification of his or her successor, or until his or her earlier death, resignation or removal. Any Director may resign at any time by giving written notice to the Chairman of the Board, if any, the Chief Executive Officer or the Secretary. Unless otherwise stated in a notice of resignation, it shall take effect when received by the officer to whom it is directed, without any need for its acceptance.

(b) A vacancy, howsoever occurring, in a directorship shall be filled in the manner specified in the Certificate of Incorporation.

Section 2.3. Regular Meetings.

Regular meetings of the Board of Directors may be held without call or notice at such times and at such places, within or without the state of Delaware, as shall be fixed by resolution of the Board of Directors.

Section 2.4. Special Meetings.

Special meetings of the Board of Directors may be called by the Chairman of the Board, the Chief Executive Officer, the Lead Director, or a majority of the members of the Board of Directors then in office and may be held at any time, date or place, within or without the State of Delaware, as the person or persons calling the meeting shall fix. Notice of the time and place of special meetings shall be delivered personally, by telephone or by electronic transmission to each Director or sent by first-class mail or telegram, charges prepaid, addressed to each Director at that Director’s address as it is shown on the records of the Corporation. If the notice is mailed, it shall be deposited in the United States mail at least four days before the time of the holding of the meeting. If the notice is delivered personally, by

telephone, by electronic transmission or by telegram, it shall be delivered personally or by telephone or to the telegraph company at least 48 hours before the time of the holding of the meeting. Any oral notice given personally or by telephone may be communicated either to the Director or to a person at the office of the Director who the person giving the notice has reason to believe will promptly communicate it to the Director. The notice need not specify the purpose or the place of the meeting, if the meeting is to be held at the principal executive office of the Corporation.

Section 2.5. Organization.

Meetings of the Board of Directors shall be presided over by the Chairman of the Board, the Lead Director, if any, or the Chief Executive Officer (in that order), or in their absence, inability or unwillingness, by a chairman chosen at the meeting. The Secretary shall act as secretary of the meeting, but in his or her absence the chairman of the meeting may appoint any person to act as secretary of the meeting. A majority of the Directors present at a meeting, whether or not they constitute a quorum, may adjourn such meeting to any other date, time or place without notice other than announcement at the meeting.

Section 2.6. Quorum; Vote Required for Action.

(a) At all meetings of the Board of Directors, a majority of the whole Board of Directors shall constitute a quorum for the transaction of business. Unless the Certificate of Incorporation or these By-laws otherwise provide, the vote of a majority of the Directors present at a meeting at which a quorum is present shall be the act of the Board of Directors. A meeting at which a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors, if any action taken is approved by at least a majority of the required quorum for that meeting.

(b) If a quorum is not present at any meeting of the Board of Directors, then the Directors present thereat may adjourn the meeting from time to time, without notice other than announcement at the meeting, until a quorum is present.

(c) Whenever notice is required to be given under any provision of the General Corporation Law of Delaware, the Certificate of Incorporation or these By-laws, a written waiver thereof, signed by the person entitled to notice, whether before or after the time stated therein, shall be deemed equivalent to notice. Attendance of a person at a meeting shall constitute a waiver of notice of such meeting, except when the person attends a meeting for the express purpose of objecting, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened. Neither the business to be transacted at, nor the purpose of, any regular or special meeting of the Directors, or members of a committee of the Board of Directors, need be specified in any written waiver of notice unless so required by the Certificate of Incorporation or these By-laws.

Section 2.7. Telephonic Meetings.

Directors, or any committee of Directors designated by the Board of Directors, may participate in a meeting of the Board of Directors or such committee by means of conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other, and participation in a meeting pursuant to this Section 2.7 shall constitute presence in person at such meeting.

Section 2.8. Informal Action by Directors.

Unless otherwise restricted by the Certificate of Incorporation or these By-laws, any action required or permitted to be taken at any meeting of the Board of Directors or of any committee thereof, may be taken without a meeting if all members of the Board of Directors or such committee, as the case may be, consent thereto in writing (which may be in counterparts), and the written consent or consents are filed with the minutes of proceedings of the Board of Directors or such committee.

Section 2.9. Reliance Upon Records.

Every Director, and every member of any committee of the Board of Directors, shall, in the performance of his or her duties, be fully protected in relying in good faith upon the records of the Corporation and upon such information, opinions, reports or statements presented to the Corporation by any of its officers or employees, or committees of the Board of Directors, or by any other person as to matters the Director or member reasonably believes are within such other person's professional or expert competence and who has been selected with reasonable care by or on behalf of the Corporation, including, but not limited to, such records, information, opinions, reports or statements as to the value and amount of the assets, liabilities and/or net profits of the Corporation, or any other facts pertinent to the existence and amount of surplus or other funds from which dividends might properly be declared and paid, or with which the Corporation's capital stock might properly be purchased or redeemed.

Section 2.10. Interested Directors.

No contract or transaction between the Corporation and one or more of its Directors or officers, or between the Corporation and any other corporation, partnership, association or other organization in which one or more of its Directors or officers are Directors or officers, or have a financial interest, shall be void or voidable solely for this reason, or solely because the Director or officer is present at or participates in the meeting of the Board of Directors or committee thereof which authorizes the contract or transaction, or solely because such person’s or their votes are counted for such purpose if (i) the material facts as to such person’s or their relationship or interest and as to the contract or transaction are disclosed or are known to the Board of Directors or the committee, and the Board of Directors or committee in good faith authorizes the contract or transaction by the affirmative votes of a majority of the disinterested Directors, even though the disinterested Directors be less than a quorum; or (ii) the material facts as to such person’s or their relationship or interest and as to the contract or transaction are disclosed or are known to the stockholders entitled to vote thereon, and the contract or transaction is specifically approved in good faith by vote of the stockholders; or (iii) the contract or transaction is fair as to the Corporation as of the time it is authorized, approved or ratified, by the Board of Directors, a committee thereof or the stockholders. Common or interested Directors may be counted in determining the presence of a quorum at a meeting of the Board of Directors or of a committee which authorizes the contract or transaction.

Section 2.11. Disqualification from Board or Committees.

No member of the Board or any committee established by the Corporation shall be eligible to serve on the Board or any such committee if the individual has committed a “disciplinary offense” as defined by the CME Rules, as defined in Section 8.6 (Disqualification from Certain Committees and Governing Boards, currently Exchange Rule 300.D) or would be otherwise ineligible pursuant to such rule.

Section 2.12. Compensation.

Unless otherwise restricted by the Certificate of Incorporation, the Board of Directors shall have the authority to fix the compensation of Directors. The Directors shall be paid their reasonable expenses, if any, of attendance at each meeting of the Board of Directors or a committee thereof and may be paid a fixed sum for attendance at each such meeting and an annual retainer or salary for services as a Director or committee member. No such payment shall preclude any Director from serving the Corporation in any other capacity and receiving compensation therefor.

Section 2.13. Presumption of Assent.

Unless otherwise provided by the laws of the State of Delaware, a Director who is present at a meeting of the Board of Directors or of a committee thereof at which action is taken on any matter shall be presumed to have assented to the action taken unless his or her dissent shall be entered in the minutes of such meeting or unless he or she shall file his or her written dissent to such action with the person acting as secretary of such meeting before the adjournment thereof or shall forward such dissent by registered mail to the Secretary immediately after the adjournment of such meeting. Such right to dissent shall not apply to a Director who voted in favor of such action.

ARTICLE III

Section 3.1. General.

To the fullest extent permitted by law and the Certificate of Incorporation, the Board of Directors of the Corporation shall have the power to appoint, and to delegate authority to, such committees of the Board of Directors of the Corporation as it determines to be appropriate from time to time.

Section 3.2. Additional and Standing Committees.

In addition to such committees as may be authorized by the Board of Directors of the Corporation from time to time, the Corporation shall have such additional and standing committees, which shall be composed of such persons having such powers and duties, as provided in the Rules. Any person may be disqualified from serving on or participating in the affairs of any committee to the extent provided in the Rules.

ARTICLE IV

Section 4.1. Officers.

The Board of Directors shall elect from among its members a Chairman of the Board. The Board of Directors shall also elect a Chief Executive Officer, a Secretary and such other additional officers with such titles as the Board of Directors shall determine. The Board of Directors shall also have the authority to elect a Lead Director with the responsibilities set forth in the Corporation's Corporate Governance Principles. Any number of offices may be held by the same person. Each Board officer and officer of the Corporation shall hold office until his or her successor is elected and qualified or until his or her earlier death, resignation or removal.

Section 4.2. Resignation; Removal; Vacancies.

Any Board officer or officer of the Corporation may resign at any time by giving written notice to the Chairman of the Board, the Chief Executive Officer or the Secretary. Unless otherwise stated in a notice of resignation, it shall take effect when received by the Board officer or officer to whom it is directed, without any need for its acceptance. Any resignation is without prejudice to the rights, if any, of the Corporation under any contract to which such officer is a party. The Board of Directors may remove any Board officer or officer with or without cause at any time by an affirmative vote of the majority of the Board of Directors, but such removal shall be without prejudice to the contractual rights, if any, of such officer with the Corporation. A vacancy occurring in any Board or executive office of the Corporation may be filled for the unexpired portion of the term thereof by the Board of Directors at any regular or special meeting.

Section 4.3. Powers and Duties of Officers.

The Board officers and officers of the Corporation shall have such powers and duties in the management of the Corporation as may be prescribed by the Board of Directors and, to the extent not so provided, as generally pertain to their respective offices, subject to the control of the Board of Directors. The Board of Directors may require any officer, agent or employee to give security for the faithful performance of his or her duties.

ARTICLE V

Section 5.1. Certificates; Uncertificated Shares.

The shares of the Corporation's stock shall be represented either by book entries on the Corporation's books, if authorized by the Board of Directors, or by certificates signed by, or in the name of the Corporation by its Chairman of the Board, its Chief Executive Officer or a Senior Managing Director, and may be countersigned by its Secretary or an Assistant Secretary, certifying the number of shares owned by such stockholder in the Corporation. Any of or all the signatures on a certificate may be facsimile. In case any officer, transfer agent, or registrar who has signed or whose facsimile signature has been placed upon a certificate shall have ceased to be such officer, transfer agent or registrar before such certificate is issued, it may be issued by the Corporation with the same effect as if such officer, transfer agent or registrar continued to be such at the date of issue. Upon the request of the registered owner of uncertificated shares, the Chief Executive Officer or his designee shall send to the registered owner a certificate representing such shares.

In the case of uncertificated shares, within a reasonable time after the issuance or transfer thereof, the Chief Executive Officer or his designee shall send to the registered owner of shares of Common Stock of the Corporation a written notice containing (i) (A) a full statement of the designations, relative rights, preferences and limitations of the shares of the class and series issued or transferred, so far as the same have been determined and the authority of the Board of Directors to divide the shares into classes or series and to determine and change the relative rights, preferences and limitations of any class or series; or (B) a declaration that the Corporation will furnish to the stockholder, upon request and without charge, a statement containing the information described in the preceding clause (A); (ii) a statement that the Corporation is organized under the laws of the State of Delaware; (iii) the name of the person to whom the uncertificated shares have been issued or transferred; (iv) the number and class of shares, and the designation of the series, if any, to which such notice applies; and (v) any restrictions on transfer of the shares, in accordance with Section 202 of the Delaware General Corporation Law. The notice referred to

in the preceding sentence shall also contain the following statement: "This notice is merely a record of the rights of the addressee as of the time of its issuance. Delivery of this statement, of itself, confers no rights on the recipient. This notice is neither a negotiable instrument nor a security."

Section 5.2. Lost, Stolen or Destroyed Certificates; Issuance of New Certificates.

The Corporation may issue a new certificate for stock in the place of any certificate theretofore issued by it, alleged to have been lost, stolen or destroyed, and the Corporation may require the owner of the lost, stolen or destroyed certificate, or such stockholder's legal representative, to indemnify the Corporation and/or to give the Corporation a bond sufficient to indemnify it against any claim that may be made against it on account of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

Section 5.3. Transfers of Stock.

Upon surrender to the Corporation or the transfer agent of the Corporation of a certificate for stock of the Corporation duly endorsed or accompanied by proper evidence of succession, assignment or authority to transfer or, if the relevant stock certificate is claimed to have been lost, stolen or destroyed, upon compliance with the provisions of Section 5.2 of these By-laws, and upon payment of applicable taxes with respect to such transfer, and in compliance with the transfer restrictions applicable to such shares under the Certificate of Incorporation, these By-laws or rules of the Corporation and any other applicable transfer restrictions of which the Corporation shall have notice, the Corporation shall issue a new certificate or certificates for such stock to the person entitled thereto, cancel the old certificate and record the transaction upon its books. Transfers of stock shall be made only on the books of the Corporation by the registered holder thereof or by such holder's attorney or successor duly authorized as evidenced by documents filed with the Secretary. Whenever any transfer of stock shall be made for collateral security, and not absolutely, it shall be so expressed in the entry of transfer if, when the certificate or certificates representing such stock are presented to the Corporation for transfer, both the transferor and transferee request the Corporation to do so.

Section 5.4. Transfers of Uncertificated Stock.

Except as otherwise required by law, uncertificated shares of the Corporation's stock shall be transferable in the manner prescribed in these By-Laws. Transfers of uncertificated stock shall be made on the books of the Corporation only by the person then registered on the books of the Corporation as the owner of such shares or by such person's attorney lawfully constituted in writing and written instruction to the Corporation containing the following information: (i) the class of shares, and the designation of the series, if any, to which such notice applies; (ii) the number of shares transferred; and (iii) the name, address and taxpayer identification number, if any, of the party to whom the shares have been transferred and who, as a result of such transfer, is to become the new registered owner of the shares. No transfer of uncertificated stock shall be valid as against the Corporation for any purpose until it shall have been entered in the stock records of the Corporation by an entry showing from and to whom transferred.

Section 5.5. Special Designation on Certificates.

The designations, preferences, and relative, participating, optional or other special rights of each class of stock or series thereof and the qualifications, limitations or restrictions of such preferences and/or rights shall be set forth in full or summarized on the face or back of the certificate that the Corporation shall issue to represent such class or series of stock; provided, however, that, except as otherwise provided in Section 202 of the General Corporation Law of Delaware, in lieu of the foregoing requirements there may

be set forth on the face or back of the certificate that the Corporation shall issue to represent such class or series of stock a statement that the Corporation will furnish without charge to each stockholder who so requests the powers, designations, preferences, and the relative, participating, optional or other special rights of each class of stock, or series thereof, and the qualifications limitations or restrictions of such preferences and/or rights.

Section 5.6. Stock Transfer Agreements.

Subject to the provisions of the Certificate of Incorporation, the Corporation shall have power to enter into and perform any agreement with any number of stockholders of any one or more classes, or series thereof, of stock of the Corporation to restrict the transfer of such shares owned by such stockholders in any manner not prohibited by the General Corporation Law of Delaware.

Section 5.7. Registered Stockholders.

The Corporation shall be entitled to recognize the exclusive right of a person registered on its books as the owner of shares to receive dividends and to vote as such owner, shall be entitled to hold liable for calls and assessments the person registered on its books as the owner of shares, and shall not be bound to recognize any equitable or other claim to or interest in such share or shares on the part of another person, whether or not it shall have express or other notice thereof, except as otherwise provided by the laws of Delaware.

Section 5.8. Other Regulations.

The issue, transfer, conversion and registration of stock certificates shall be governed by such other regulations as the Board of Directors may establish.

ARTICLE VI

Section 6.1. Manner of Notice.

Except as otherwise provided by law, the Certificate of Incorporation or these By-laws, whenever notice is required to be given to any stockholder, Director or member of any committee of the Board of Directors, such notice may be given by personal delivery or by depositing it, in a sealed envelope, in the United States mails, first class, postage prepaid, addressed, or by transmitting it via telecopier, to such stockholder, Director or member, either at the address of such stockholder, Director or member as it appears on the records of the Corporation or, in the case of such a Director or member, at his or her business address; and such notice shall be deemed to be given at the time when it is thus personally delivered, deposited or transmitted, as the case may be. Such requirement for notice shall also be deemed satisfied, except in the case of stockholder meetings, if actual notice is received orally or by other writing by the person entitled thereto as far in advance of the event with respect to which notice is being given as the minimum notice period required by law or these By-laws.

Section 6.2. Dispensation with Notice.

(a) Whenever notice is required to be given by law, the Certificate of Incorporation or these By-laws to any stockholder to whom (i) notice of two consecutive annual meetings of stockholders, and all notices of meetings of stockholders or (ii) all, and at least two, payments (if sent by first class mail) of dividends or interest on securities of the Corporation during a 12-month period, have been mailed addressed to such stockholder at the address of such stockholder as shown on the records of the Corporation and have been

returned undeliverable, the giving of such notice to such stockholder shall not be required. Any action or meeting which shall be taken or held without notice to such stockholder shall have the same force and effect as if such notice had been duly given. If any such stockholder shall deliver to the Corporation a written notice setting forth the then current address of such stockholder, the requirement that notice be given to such stockholder shall be reinstated.

(b) Whenever notice is required to be given by law, the Certificate of Incorporation or these By-laws to any person with whom communication is unlawful, the giving of such notice to such person shall not be required, and there shall be no duty to apply to any governmental authority or agency for a license or permit to give such notice to such person. Any action or meeting which shall be taken or held without notice to any such person with whom communication is unlawful shall have the same force and effect as if such notice had been duly given.

Section 6.3. Waiver of Notice.

Any written waiver of notice, signed by the person entitled to notice, whether before or after the time stated therein, shall be deemed equivalent to notice. Attendance of a person at a meeting shall constitute a waiver of notice of such meeting, except when the person attends a meeting for the express purpose of objecting, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened. Neither the business to be transacted at, nor the purpose of any regular or special meeting of the stockholders, Directors, or members of a committee of Directors need be specified in any written waiver of notice.

ARTICLE VII

Section 7.1. Right to Indemnification.

Each person who was or is made a party or is threatened to be made a party to or is otherwise involved in any action, suit or proceeding, whether civil, criminal, administrative or investigative (hereinafter a "proceeding"), by reason of the fact that he or she is or was a Director, officer, trustee, committee member or employee of the Corporation or is or was serving at the request of the Corporation as a Director, officer, trustee, committee member or employee of another corporation or of a partnership, joint venture, trust or other enterprise, including service with respect to an employee benefit plan (hereinafter an "indemnitee"), shall be indemnified and held harmless by the Corporation to the fullest extent authorized by the DGCL, as the same exists or may hereafter be amended (but, in the case of any such amendment, only to the extent that such amendment permits the Corporation to provide broader indemnification rights than such law permitted the Corporation to provide prior to such amendment) against all expense, liability and loss (including attorneys' fees, judgments, fines, ERISA excise taxes or penalties and amounts paid in settlement) reasonably incurred or suffered by such indemnitee in connection therewith; provided, however, that, except as provided in Section 7.3 of this Article VII of these By-laws with respect to proceedings to enforce rights to indemnification, the Corporation shall indemnify any such indemnitee in connection with a proceeding (or part thereof) initiated by such indemnitee only if such proceeding (or part thereof) was authorized by the Board of Directors of the Corporation.

Section 7.2. Right to Advancement of Expenses.

Expenses (including attorney's fees) incurred by an indemnitee in defending any proceeding shall be paid by the Corporation in advance of its final disposition (hereinafter an "advancement of expenses"); provided, however, that an advancement of expenses shall be made only upon delivery to the Corporation

of an undertaking (hereinafter an "undertaking"), by or on behalf of such indemnitee, to repay all amounts so advanced if it shall ultimately be determined by final judicial decision from which there is no further right to appeal (hereinafter a "final adjudication") that such indemnitee is not entitled to be indemnified for such expenses under this Section 7.2 of this Article VII of these By-laws or otherwise.

Notwithstanding the foregoing or any other provision of these By-laws, no advance shall be made by the Corporation to an indemnitee who is not a Director or officer of the Corporation and no non-director or non-officer indemnitee shall be entitled to such advance (i) if a determination is reasonably and promptly made by the Board of Directors by a majority vote of those Directors who have not been named parties to the action, even though less than a quorum, or if there are no such Directors or if such Directors so direct, by independent legal counsel, that, based upon the facts known by the Board of Directors or such counsel at the time such determination is made: (x) the person seeking advancement of expenses (1) acted in bad faith, (2) did not act in a manner that he or she reasonably believed to be in or not opposed to the best interests of the Corporation; or (3) acted contrary to, or omitted to act in accordance with, written policies of the Corporation applicable to such person; (y) with respect to any criminal proceeding, such person believed or had reason to believe that his or her conduct was unlawful; or (z) such person deliberately breached his or her duty to the Corporation, and (ii) unless an undertaking by or on behalf of such non-director or non-officer indemnitee has been delivered to the Corporation and such indemnitee has provided such security or satisfied such conditions as may be imposed by the Board at the time of such delivery.

The rights to indemnification and to the advancement of expenses conferred in Sections 7.1 and 7.2 of this Article VII of these By-laws shall be contract rights and such rights shall continue as to an indemnitee who has ceased to be a Director, officer, trustee, committee member or employee and shall inure to the benefit of the indemnitee's heirs, executors and administrators.

Section 7.3. Claims.

If a claim for indemnification or advancement of expenses under this Article VII of these By-laws is not paid in full within sixty (60) days after a written claim therefor by an indemnitee has been received by the Corporation, the indemnitee may file suit to recover the unpaid amount of such claim and, if successful in whole or in part, shall be entitled to be paid the expense of prosecuting such claim. In any such action, the Corporation shall have the burden of proving that the indemnitee is not entitled to the requested indemnification or advancement of expenses under the DGCL.

Section 7.4. Non-Exclusivity of Rights.

The rights to indemnification and to the advancement of expenses conferred in this Article VII of these By-laws shall not be exclusive of any other right which any person may have or hereafter acquire under any statute, the Certificate of Incorporation, By-laws, agreement, vote of stockholders or disinterested Directors or otherwise.

Section 7.5. Insurance.

The Corporation may maintain insurance, at its expense, to protect itself and any Director, officer, trustee, committee member, employee or agent of the Corporation or another corporation, partnership, joint venture, trust or other enterprise against any expense, liability or loss, whether or not the Corporation would have the power to indemnify such person against such expense, liability or loss under the DGCL.

Section 7.6. Indemnification of Agents of the Corporation.

The Corporation may, to the extent authorized from time to time by the Board of Directors of the Corporation, grant rights to indemnification and to the advancement of expenses to any agent of the Corporation to the fullest extent of the provisions of this Article VII of these By-laws with respect to the indemnification and advancement of expenses of the indemnitees hereunder.

Section 7.7. Corporation Defense Expenses.

Any member or member firm of the Corporation who fails to prevail in a lawsuit or any other type of legal proceeding instituted by that member or member firm against the Corporation or any of its officers, Directors, committee members, employees or agents must pay to the Corporation all reasonable expenses, including attorney's fees, incurred by the Corporation in the defense of such proceeding. Any member or member firm required to compensate the Corporation pursuant to this section shall be assessed interest on such amount at the rate of Prime plus one percent (1%), which interest shall accrue from the date such amount was demanded in writing after the member or member firm failed to prevail in a lawsuit or any other type of legal proceeding against the Corporation.

ARTICLE VIII

Section 8.1. Form of Records.

Any records maintained by the Corporation in the regular course of its business, including its stock ledger, books of account, and minute books, may be kept on, or be in the form of, magnetic tape, diskette, photographs, microphotographs, or any other information storage device, provided that the records so kept can be converted into clearly legible form within a reasonable time. The Corporation shall so convert any records so kept upon the request of any person entitled to inspect the same.

Section 8.2. Execution of Corporate Contracts and Instruments.

The Board of Directors, except as otherwise provided in these By-laws, may authorize any officer or officers, or agent or agents, to enter into any contract or execute any instrument in the name of and on behalf of the Corporation; such authority may be general or confined to specific instances. Unless so authorized or ratified by the Board of Directors or within the agency power of an officer, no officer, agent or employee shall have any power or authority to bind the Corporation by any contract or engagement or to pledge its credit or to render it liable for any purpose or for any amount.

Section 8.3. Severability.

If any provision of these By-laws shall be held to be invalid, illegal, unenforceable or in conflict with the provisions of the Corporation's Certificate of Incorporation, then such provision shall nonetheless be enforced to the maximum extent possible consistent with such holding and the remaining provisions of these By-laws (including without limitation, all portions of any section of these By-laws containing any such provision held to be invalid, illegal, unenforceable or in conflict with the Certificate of Incorporation, that are not themselves invalid, illegal, unenforceable or in conflict with the Certificate of Incorporation) shall remain in full force and effect.

Section 8.4. Construction; Definitions.

Unless the context requires otherwise, the general provisions, rules of construction, and definitions in the General Corporation Law of Delaware shall govern the construction of these By-laws. Without limiting the generality of this provision, the singular number includes the plural, the plural number includes the singular, and the term "person" includes both a corporation and a natural person.

Section 8.5. Dividends.

The Board of Directors, subject to any restrictions contained in the General Corporation Law of Delaware or the Certificate of Incorporation, may declare and pay dividends upon the shares of its capital stock. Dividends may be paid only in cash or in property. The Board of Directors may set apart out of any of the funds of the Corporation available for dividends a reserve or reserves for any proper purpose and may abolish any such reserve. Such purposes shall include, but not be limited to, equalizing dividends, repairing or maintaining any property of the Corporation, and meeting contingencies.

Section 8.6. Consolidated Rules of the Chicago Mercantile Exchange Inc.

The affairs and operations of the Corporation in addition to being governed by the Delaware General Corporation Law, the Certificate of Incorporation and these By-Laws, shall also be governed by the Consolidated Rules of Chicago Mercantile Exchange Inc. (the "CME Rules"). Where there exists any inconsistency between the CME Rules and the General Corporation Law of the State of Delaware, the Certificate of Incorporation or these By-Laws, the General Corporation Law of the State of Delaware, the Certificate of Incorporation or these By-Laws shall govern to the extent of the inconsistency.

Section 8.7. Transparency of Governance Arrangements

For purposes of the Company's activities as a swap data repository, the Company shall maintain governance arrangements that are transparent to support, among other things, the objectives set forth in Section 21(f)(2) of the Act and Rule 91-507(8) as set forth by the Canadian Regulators and Section 2.4.1 of ASIC Derivative Trade Repository Rules 2013.

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit B

EXHIBIT B

Exhibit Request:

As of the latest date practicable within one (1) month of the date Form 1-N is filed, a copy of all written rulings, settled practices having the effect of rules, and interpretations of the Governing Board or other committee of the exchange in respect of any provisions of the constitution, by-laws, rules, or trading practices of the filing exchange which are not included in Exhibit A.

Response:

Please find attached CME Definitions and Rulebook Chapters 1 through 10 as Exhibit B-1. Exhibit B-1 does not include product-specific Rulebook Chapters. CME will separately submit product related Rulebook Chapters containing listing standards and product terms and conditions for security futures to the SEC via rule filing pursuant to Section 19(b)(7) of the Exchange Act. Additionally, please find attached Market Regulation Advisory Notices ("MRANs") relating to CME Rules as Exhibit B-2.

Exhibit B-1

DEFINITIONS

ACT OR CEA

The term “Act” or “CEA” shall mean the Commodity Exchange Act, as amended from time to time.

AGGREGATE BASE AVAILABLE FUNDS

The sum of any remaining Base Collateral, any remaining Base Customer Collateral (if applicable as described in Rule 802.A.2), any Remaining Base Priority of Payments and the Aggregate Base Pays.

AGGREGATE BASE COLLECTS

The sum of all Proprietary Base Collects, all Customer Futures Collects, all Individual Customer Swap Collects and the amount of payments utilized for position liquidation pursuant to Rule 802.B.7(b)(ii).

AGGREGATE BASE PAYS

The sum of all Proprietary Base Pays, Customer Futures Pays and Individual Customer Swap Pays.

AGGREGATE IRS AVAILABLE FUNDS

The sum of any remaining IRS Collateral, any remaining IRS Customer Collateral (if applicable as described in Rule 8G802.A.2), any Remaining IRS Priority of Payments and the Aggregate IRS Pays.

AGGREGATE IRS COLLECTS

The sum of all Proprietary IRS Collects, all Individual Customer IRS Collects and the amount of payments utilized for position liquidation pursuant to Rule 8G802.B.2(b)(ii).

AGGREGATE IRS PAYS

The sum of all Proprietary IRS Pays and all Individual Customer IRS Pays.

AUCTION PAYMENTS

The amounts that would be owed to winner(s) of an auction of a defaulted Clearing Member’s portfolio (or some portion thereof).

BASE ASSESSMENTS

The amounts by which the Clearing House assesses Base Clearing Members collectively pursuant to Rule 802.

BASE CLEARING MEMBER

A firm meeting the requirements of, and approved for, clearing membership with respect to Base Contracts at the Exchange.

BASE COLLATERAL

All assets of a defaulting Base Clearing Member that are available to the Clearing House, including without limitation its Base Guaranty Fund contribution (pursuant to Rule 816) including any excess amounts, its performance bonds on deposit with the Clearing House relating to the Base Guaranty Fund Products, any partial payment amounts or settlement variation gains in respect of Base Guaranty Fund Products, the proceeds of the sale of any membership assigned to it for clearing qualification, excess performance bond or guaranty fund deposits of the clearing member for non-Base Guaranty Fund Products and any of its other assets held by, pledged to or otherwise available to the Clearing House but excluding amounts carried in any customer account class.

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BASE CONTRACT

A Base Guaranty Fund Product that has been accepted for clearing by the Clearing House, provided however that for purposes of Rules 802.B.7, 802.B.8, 802.B.9, 802.B.10(b), and 802.B.11, the term Base Contract shall include Commingled Futures Positions (as such term is defined in Rule 8G831).

BASE CUSTOMER COLLATERAL

The sum of Base Swap Customer Collateral, Base Futures Customer Collateral and Base Futures 30.7 Customer Collateral, each as applicable pursuant to Rule 802.A.2.

BASE PRIORITY OF PAYMENTS

The CME Contribution, the Base Guaranty Fund and the Base Assessments, which shall be used in the order set forth in Rule 802.B.

BASE PRODUCT CATEGORY

Each category and sub-category of Base Contracts as determined by the Clearing House for default management purposes.

BIDDING OTC FIRM

A non-defaulted Base OTC Clearing Member that is required to participate in the Clearing House's default drill exercises and liquidation auctions for any OTC Derivative Product Category in which it has open interest, as determined by the Clearing House

BLOCK TRADE

A privately negotiated futures, option on futures or swaps transaction that is executed apart from the public auction market and that is permitted in designated contracts subject to specified conditions. These trades are governed by Rule 526 ("Block Trades").

BOARD

The Board of Directors of the Exchange or any other body acting in lieu of and with the authority of the Board.

BROAD-BASED INDEX FUTURE

A futures contract based upon an index that is not considered narrow-based as defined in Section 1a(35) of the Commodity Exchange Act.

BROKERAGE

The fee paid to an agent to facilitate the execution of orders.

BUSINESS DAY

In a given commodity, any day on which a settlement price is determined.

BY-LAWS

The By-Laws of the Exchange, unless otherwise specified.

CASH COMMODITY

The actual physical commodity or financial instrument as distinguished from the futures or swaps contract that is based on the physical commodity or financial instrument. Also referred to as "spot commodity."

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CBOT

The Board of Trade of the City of Chicago, Inc.

CERTIFICATE OF INCORPORATION

The Certificate of Incorporation of the Exchange, unless otherwise specified.

CFTC OR COMMISSION

The U.S. Commodity Futures Trading Commission.

CHAIRMAN

The Chairman of the Board of Directors, or one acting in lieu of and with the authority of the Chairman of the Board.

CHIEF EXECUTIVE OFFICER OR CEO

The Chief Executive Officer of the Exchange or one duly authorized to act in lieu of and with the authority of the Chief Executive Officer.

CLASS A SHARE

A share of Class A Common Stock of CME Group Inc. Class A Shares shall confer no trading rights.

CLASS B STOCKHOLDER

The registered owner of one or more Class B Shares.

CLEAR DATE OF THE FX OTC CLEARED TRANSACTION

For purposes of these rules, the "clear date of the foreign exchange (FX) over-the-counter (OTC) cleared transaction" is the date on which an original spot, forward and swap FX OTC transaction clears at CME Clearing as a substituted, cleared transaction.

CLEARED SWAPS CUSTOMER ACCOUNT

Shall have the meaning ascribed to such term in CFTC Regulation 22.1; provided however, that, for purposes of CME and Exchange Rules, the term Cleared Swaps Customer Account shall not include an account in which positions in Cleared Swaps (or the money, securities and/or other property margining, guaranteeing or securing such derivatives) are, pursuant to a CFTC order, commingled with positions and funds held in segregated accounts maintained in accordance with Section 4d of the CEA.

CLEARED SWAPS CUSTOMERS

Shall have the meaning ascribed to such term in CFTC Regulation 22.1.; provided however, that a customer is only a Cleared Swaps Customer with respect to its positions in Cleared Swaps (as defined in CFTC Regulation 22.1); provided further, that, for purposes of CME Rules, the term Cleared Swaps Customers shall not include customers whose Cleared Swaps (as defined in CFTC Regulation 22.1) and whose money, securities and/or other property margining, guaranteeing or securing such Cleared Swaps are, pursuant to a CFTC order, commingled with positions and funds held in segregated accounts maintained in accordance with Section 4d of the CEA.

CLEARING HOUSE

The CME Clearing House, also referred to as CME Clearing, a division of CME.

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CLEARING MEMBER

A firm meeting the requirements of, and approved for, clearing membership at the Exchange. The term "clearing member" as used in the Rules shall include all clearing member categories set forth in Rule 900, unless otherwise specified.

CLOSING RANGE

The high and low prices, inclusive of bids and offers, recorded during the time period designated by the Exchange as the close of pit trading in a particular contract.

CME

Chicago Mercantile Exchange Inc.

CME GROUP INC.

CME Group or CME Group Inc. is a holding company and the parent of CME, CBOT and NYMEX.

COMBINATION ORDER/SPREAD ORDER

A combination of buy and/or sell orders for the same account, except as provided by Rule 527, at the market, at a fixed differential or by some other appropriate pricing convention. Also referred to as a spread order.

COMEX

Commodity Exchange, Inc.

COMMODITY

Any product approved and designated by the Board for trading or clearing pursuant to the rules of the Exchange.

CONTRACT

Depending on the context in which it is used, a term of reference describing either a unit of trading in a particular futures, options, or swaps or cleared product or a product approved and designated by the Board for trading or clearing pursuant to the rules of the Exchange.

DELIVERY MONTH

Unless otherwise specified in the rules, the designated period of time during which delivery intents may be tendered or deliveries may be completed.

DERIVATIVES CLEARING ORGANIZATION OR DCO

A clearing organization as defined in CFTC Regulation 1.3.

DESIGNATED CONTRACT MARKET OR DCM

A contract market as defined in CFTC Regulation 1.3.

DISCIPLINARY OFFENSE

Any offense as set forth in Rule 300.E.

ELECTRONIC DEVICE

Any type of voice or data communications interface, including but not limited to a computer, headset, trading device, microphone, telephone or camera.

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EMERGENCY

Any occurrence or circumstance which, in the opinion of the Exchange, requires immediate action and threatens or may threaten fair and orderly trading, clearing, delivery or liquidation of any contracts on the Exchange. Occurrences and circumstances which the Exchange may deem emergencies are set forth in the Rules.

EXCHANGE

Chicago Mercantile Exchange Inc.

EXCHANGE OF OPTIONS FOR OPTIONS (EOO) TRADE

A privately negotiated and simultaneous exchange of an Exchange option position for a corresponding OTC option position. An EOO is one type of an authorized Exchange for Related Position (EFRP) trade governed by Rule 538.

EXCHANGE FOR PHYSICAL (EFP) TRADE

A privately negotiated and simultaneous exchange of an Exchange futures position for a corresponding cash position. An EFP is one type of an authorized Exchange for Related Position (EFRP) trade governed by Rule 538.

EXCHANGE FOR RISK (EFR) TRADE

A privately negotiated and simultaneous exchange of an Exchange futures position for a corresponding OTC swap or other OTC instrument. An EFR is one type of an authorized Exchange for Related Position (EFRP) trade governed by Rule 538.

EXCHANGE OFFICIAL

An employee or member designated by the Exchange to perform or execute certain acts.

EXERCISE PRICE

The terms "exercise price", "strike price" and "striking price" shall be synonymous and mean the price at which the futures contract underlying the options contract will be assigned upon exercise of the option. For options contracts which are exercised into multiple futures contracts, the exercise price represents the spread price differential between the futures contracts.

EXPIRATION DATE

The term "expiration date" shall mean the last day on which an options contract may be exercised.

FIRM

The term "firm" shall mean a corporation, partnership, association, sole proprietorship or other eligible entity.

FLOOR

Except as otherwise provided by the Exchange, the term "Floor" shall mean any trading floor on which Exchange contracts are listed for open outcry trading.

FLOOR BROKER

An Exchange member who is registered as a floor broker under the CEA.

FLOOR TRADER

An Exchange member who is registered as a floor trader under the CEA.

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FOLLOWING DAY (OR OTHER SIMILAR EXPRESSION)

The following, or subsequent, business day.

FORCE MAJEURE

Any circumstance (including but not limited to an act of God, strike, lockout, blockage, embargo, governmental action or terrorist activity) which is beyond the control of the buyer or seller and precludes either party from making or taking delivery of product or precludes the Exchange from determining a final settlement as provided for in Exchange Rules.

FOREIGN BOARD OF TRADE OR FBOT

A board of trade or exchange located outside the U.S., its territories or possessions and which is not registered with the CFTC as a designated contract market.

FORWARD FX OTC CLEARED TRANSACTION

For purposes of these rules, a "forward" foreign exchange (FX) over-the-counter (OTC) cleared transaction shall be an agreement between counterparties to exchange ("delivery") of the associated currency pairs at a maturity date greater than one or two business days in the future. A forward FX transaction may be for standard delivery maturities from the original trade date, such as TOM Next (tomorrow next or day after tomorrow), 1-week, 2-weeks, 3-weeks, 1-month, 2-months, 3-months, …, 6-months, …, 1-year, 18-months, 2-years, etc. Also, a forward FX transaction may be for broken date maturities, that is, for delivery on any good business day in both the issuing countries of the associated currency pair that is not one of the standard delivery dates.

FUTURES COMMISSION MERCHANT OR FCM

A person that solicits or accepts customer orders to buy or sell futures or options on futures contracts or that clears transactions in swaps or futures or options on futures contracts for customers and accepts money or other assets from customers in connection with such orders or transactions, and that is required to be registered as an FCM with the CFTC. As used in the Rules the terms do not include a person that is exempt from registration as an FCM pursuant to Commission Regulations.

FUTURES CONTRACT

A legally binding agreement to buy or sell a commodity or financial instrument at a later date pursuant to the Rules of the Exchange or the rules of another exchange for which the Clearing House provides clearing services. Futures contracts are normally standardized according to the quality, quantity, delivery period and location for each commodity, with price as the only variable.

GLOBEX®

Globex refers to CME Globex, an electronic trading platform.

GLOBEX TERMINAL OPERATOR

Globex terminal operator refers to 1) any person who physically enters orders into Globex or 2) any automated trading system which enters orders into Globex, either directly or through an automated order routing system or independent software vendor. All Globex terminal operators must be identified to the Exchange in accordance with the provisions of Rule 576 (Identification of Globex Terminal Operators).

GLOBEX TRADING HOURS

Those hours designated by the Board of Directors for trading particular contracts on Globex.

GUARANTY FUND DEPOSIT

The amount required to be deposited with the Clearing House by the clearing member as a guaranty of its obligations to the Clearing House.

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HOLIDAY

Any day declared to be a holiday by these rules or by a resolution of the Board on which the Exchange is closed. When any such holiday falls on Sunday, the following Monday shall be considered such holiday. When any such holiday falls on Saturday, the immediately preceding Friday shall be considered such holiday.

INITIAL PERFORMANCE BOND

Generally, a factored amount over the maintenance performance bond requirement as determined by the Clearing House.

INTRODUCING BROKER OR IB

A firm or individual that solicits and accepts orders to buy or sell futures, options on futures contracts, or swaps from customers but does not accept money or other assets from such customers. An IB must be registered with the CFTC, unless exempt from registration pursuant to CFTC Regulations.

INVESTIGATIVE AND HEARING COMMITTEES

The investigative and hearing committees of the Exchange are the Business Conduct Committee, or Hearing Panels of the Business Conduct Committee, the Floor Conduct Committee, Hearing Panels of the Board of Directors and such other committees created for this purpose by the Board.

IRS CLEARING MEMBER

Has the meaning as set forth in the CME Rulebook in Rule 8G04.

IRS COLLATERAL

All assets of a defaulting IRS Clearing Member that are available to the Clearing House, including without limitation its IRS Guaranty Fund contribution (pursuant to Rule [8G07]) including any excess amounts, performance bond amounts for IRS Contracts including any excess amounts, any partial payment amounts or settlement variation gains in respect of IRS Contracts, the proceeds of the sale of any membership assigned to it for clearing qualification, excess performance bond or guaranty fund deposits of the IRS Clearing Member for non-IRS Products, and any other assets held by, pledged to or otherwise available to the Clearing House but excluding amounts carried in any customer account class.

LIQUIDITY EVENT

The Clearing House requires liquidity (1) to satisfy obligations of a defaulted or suspended Clearing Member, (2) to satisfy obligations associated with the transfer of account(s) of a defaulted or suspended Clearing Member or (3) as a result of a liquidity constraint or default by a depositary or settlement bank.

MAINTENANCE PERFORMANCE BOND

The minimum amount of performance bond equity required to be maintained in an account. The maintenance performance bond requirement is the actual risk performance bond as determined by the Clearing House.

MANDATED BASE CLEARING MEMBER

A Base Clearing Member that is required to participate in the Clearing House's default drill exercises and auctions for a given Base Product Category

MEMBER

Unless otherwise specified in the rules, an individual owning or holding a membership in the Exchange.

MEMBER FIRM

An entity to which membership privileges on the Exchange have been conferred.

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NARROW-BASED INDEX FUTURE

Refers to a futures contract based upon a Security Index that is considered narrow-based as defined in Section 1a(35) of the Commodity Exchange Act.

NATIONAL FUTURES ASSOCIATION OR NFA

The National Futures Association. NFA is an independent self-regulatory organization for the U.S. futures industry with no ties to any specific marketplace.

NON-MEMBER

Unless otherwise specified in the rules, any Person who is not a Member of the Exchange.

NON-MEMBER FIRM

An entity to which membership privileges on the Exchange have not been conferred.

NOTICE

Except as otherwise specifically provided, a notice in writing emailed to or personally served upon the person to be notified, left at their usual place of business during business hours or mailed by U.S. First Class Mail, Certified Mail, Registered Mail or by overnight delivery to their last known place of business or residence.

NYMEX

New York Mercantile Exchange, Inc., including its wholly owned subsidiary Commodity Exchange, Inc.

OMNIBUS ACCOUNT

An account of one Futures Commission Merchant (FCM), the originating FCM, which resides on the books of another FCM (the carrying FCM), in which the transactions of two or more persons are combined and carried in the name of the originating FCM rather than in the name of the individual customers.

ORDER TYPES

(Note that not all order types are eligible for execution in a trading pit on Globex and through open outcry. Additionally, order types eligible for both venues may have different meanings depending on whether the order is to be executed in a trading pit via open outcry or through Globex.

Open Outcry Order Types

ALL-OR-NONE (AON) ORDER

Where allowed pursuant to Rule 523, an order to be executed in designated contracts in a trading pit via open outcry only for its entire quantity at a single price, with a size at or above a predetermined threshold.

DISREGARD TAPE (DRT) or NOT-HELD ORDER

Absent any restrictions, a "DRT" (Not-Held Order) means any order giving a person complete discretion over price and time in execution of the order, including discretion to execute all, some, or none of the order. A member or clearing member shall not accept an order containing the phrase "with a tick, you are held" (or similar such language). It is understood that a floor broker may trade for their own account while holding such an order without violating Rule 530 (“Priority of Customers’ Orders”) provided the customer has previously consented in writing and evidence of such general consent is indicated on the order with the “WP” (with permission) designation.

ENTER OPEN STOP (EOS) ORDER

An instruction to the clearing firm to enter a stop order after execution of a previous order has been achieved.

FILL OR KILL (FOK) ORDER

A designation, added to an order, instructing the broker to fill the order immediately in its entirety or not all. If the order is not filled immediately in its entirety, it is cancelled.

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LIMIT ORDER

An order with instructions to be executed at a specific price ("limit price") or better.

MARKET (MKT) ORDER

An order with instructions to be executed upon receipt by a floor broker at the best available price.

MARKET IF TOUCHED (MIT) ORDER

A sell (buy) order placed above (below) the market which becomes a market order when the designated price is touched.

MARKET ON CLOSE (MOC) ORDER

An order to be executed only in the closing range.

ONE-CANCELS-OTHER (OCO) ORDER

A combination of two orders, in which the execution of either one automatically cancels the other.

OPEN ORDER (GOOD-TILL-CANCELLED)

An order which remains in force until cancelled. Without such designation, all unfilled orders are cancelled at the end of the Regular Trading Hours Session.

OPENING ONLY ORDER

An order that is to be executed during the time period designated by the Exchange as the Regular Trading Hours session opening range time period. Any remaining unfilled quantity not executed during the time period designated as the opening range will be deemed cancelled.

STOP ORDER

An order which becomes a market order when the price designated on the order (the "Stop Price") is elected as described below.

A "Buy Stop" order is placed above the market, and is elected only when the market trades at or above, or is bid at or above, the Stop Price. A "Sell Stop" order is placed below the market, and is elected only when the market trades at or below, or is offered at or below, the Stop Price.

STOP-CLOSE ONLY ORDER

A stop order which is in effect only during the closing range. It becomes a market order if, during the closing range, the market: (1) in the case of a Buy Stop-Close Only order, trades at or above, or is bid at or above the Stop Price; or (2) in the case of a Sell Stop-Close Only order, trades at or below, or is offered at or below the Stop Price.

STOP LIMIT ORDER

A stop order which becomes executable at its limit price or better, when and if the market: (1) in the case of a Buy Stop Limit order, trades at or above, or is bid at or above the Stop Price; or (2) in the case of a Sell Stop Limit order, trades at or below, or is offered at or below the Stop Price.

Globex Order Types

The availability of specific Globex Order Types is dependent on the product, and not all Order Types are available for all products. Supported Order Types by Product are set forth in the Globex Reference Guide (http://www.cmegroup.com/globex/files/GlobexRefGd.pdf).

COMBINATION ORDER

A combination of buy and/or sell orders for the same account or accounts with the same ownership, except as provided by Rule 527, at a fixed differential or by some other appropriate pricing convention.

HIDDEN QUANTITY ORDER

An order which displays only a portion of the order to the marketplace. When the displayed quantity has been filled, another portion of the order will then be displayed to the marketplace.

LIMIT ORDER

An order to be executed at a specific price ("limit price") or better.

MARKET WITH PROTECTION ORDER

An order to execute as much of order as possible at the best current offer price (for buy orders) or bid price (for sell orders) within a range of prices predefined by the Exchange (the protected range). Any quantity which cannot be filled within the protected range will remain in the order book as a limit order at the limit of the protected range.

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MINIMUM QUANTITY ORDER

An order which is executed only if a certain minimum quantity of that order can be immediately matched. Any unfilled balance will remain in the book as a limit order at the specified price.

STOP LIMIT ORDER

An order which becomes eligible for execution at its limit price or better when the market trades at or above the stop price in the case of a buy stop limit order or at or below the stop price in the case of a sell stop limit order.

STOP WITH PROTECTION ORDER

An order which becomes eligible for execution when the designated price (the stop price) is traded on Globex. Such orders are filled only within a range of prices predefined by the Exchange (the protected range). When the stop price is triggered, the order enters the order book as a limit order with the limit price equal to the trigger price plus or minus the predefined protected range. Any quantity which cannot be filled within the protected range will remain in the order book as a limit order at the limit price.

Globex Order Duration Qualifiers

An order eligible to be entered into Globex that does not contain a duration qualifier will be cancelled if not filled during the Trading Day in which it was received or, if it was received between Trading Days, during the next Trading Day. An order may specify one of the following duration qualifiers:

DAY

An order that will be canceled if not filled by the conclusion of the Globex trade date for which it was entered.

FILL AND KILL

An order immediately filled in whole or in part at the specified price, with any remaining quantity canceled.

GOOD 'TILL CANCELED (GTC)

An order which will remain in force until executed, cancelled or the contract expires.

GOOD 'TILL DATE (GTD)

An order which will remain in force through a specified trade date unless executed or canceled, or until the contract expires.

ORIGINAL TRADE DATE OF AN FX OTC TRANSACTION

For purposes of these rules, an "original trade date of a foreign exchange (FX) over-the-counter (OTC) cleared transaction," is the date on which the two counterparties agreed to the OTC transaction that is being replaced with the FX OTC cleared transaction.

PANEL

A subcommittee selected in accordance with committee procedure to adjudicate or make a particular determination. A decision of a panel shall be deemed a decision of the committee.

PANELIST

An individual appointed to an Exchange committee who is entitled to participate in a decision on any matter under consideration by the committee or panel thereof.

PARTNER CLEARINGHOUSE

The term "Partner Clearinghouse" means a derivatives clearing organization or a clearinghouse which has agreed to act in concert with the Exchange to facilitate clearance of Security Futures Products as defined herein. A Partner Clearinghouse shall be considered a Clearing Member for purposes of the Rules except to the extent otherwise provided in an agreement between the Exchange and the Partner Clearinghouse.

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PARTICIPATING BASE OTC CLEARING MEMBER

A non-defaulted Base OTC Clearing Member that participates or is required to participate in hedging and liquidation auctions for an OTC Derivative Product Category.

PARTICIPATING EXCHANGE

An exchange or clearing house that has entered into a business relationship with the Exchange for clearing, order routing or any other business purpose, except as otherwise expressly provided in the Rules.

PERFORMANCE BOND

The minimum amount of funds that must be deposited as a performance bond by 1) an account holder with their FCM, 2) a non-clearing FCM with a clearing member or 3) a clearing member with the Clearing House.

PERFORMANCE BOND EQUITY

An account's net liquidating equity plus the collateral value of acceptable performance bond deposits.

PERSON

It shall include the singular or plural, and individuals, associations, partnerships, corporations and trusts.

REGULAR TRADING HOURS (RTH)

Those hours designated for open outcry trading of the relevant product as determined from time to time.

REMAINING BASE PRIORITY OF PAYMENTS

The amount of each non-defaulted Base Clearing Member's remaining payment obligations, if any, in respect of Base Assessments, any remaining CME Contribution, any remaining Base Guaranty Fund amounts and any remaining Base Assessments previously funded.

REQUEST FOR QUOTE

An electronic message disseminated on Globex for the purpose of soliciting bids or offers for specific contract(s) or combinations of contracts.

RULES

The Certificate of Incorporation, By-Laws, rules, interpretations, orders, resolutions, advisories, notices, manuals and similar directives of the Exchange, and all amendments thereto. The trading and clearing of all Exchange futures, options on futures, swaps, cleared-only and spot contracts shall be subject to the rules.

SECURITY FUTURES PRODUCTS

A contract based on securities products as such term is defined by 1a(45) of the Commodity Exchange Act. Security Futures Products ("SFPs") include futures contracts based upon a single security (or "stock futures"); futures contracts based upon a narrow-based security index; and, options on any security futures as those terms are defined in Sections 1a(35) and 1a(44) of the Commodity Exchange Act.

SETTLEMENT PRICE

The official daily closing price of futures, options on futures contracts, and swaps as determined in accordance with Rule 813, used by the Clearing House for marking all open positions at the close of the daily settlement cycle.

SETTLEMENT VARIATION

The change in dollar amount calculated by the Clearing House for clearing members figured to the daily settlement price on the basis of their positions.

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SPAN 2

A filtered historical value at risk margining framework.

SPOT

The actual physical commodity as distinguished from the futures or swap contract that is based on the physical commodity. Also referred to as “cash commodity.”

SPOT FX OTC CLEARED TRANSACTION

For purposes of these rules, a “spot” foreign exchange (FX) over-the-counter (OTC) cleared transaction shall be a very short-dated forward transaction with counterparties agreeing to exchange (“delivery”) of the associated currency pairs in one or two business days, whichever is the standard OTC market convention for the particular currency pairs.

SWAP

An agreement, contract, or transaction in a swap instrument, as defined by Section 1(a)47 of the Commodity Exchange Act, that is executed on or subject to the rules of the Exchange or cleared pursuant to rules of CME Clearing.

SWAP EXECUTION FACILITY OR SEF

A swap execution facility as defined in CFTC Regulation 1.3.

SWAP FX OTC CLEARED TRANSACTION

For purposes of these rules, a “swap” foreign exchange (FX) over-the-counter (OTC) cleared transaction shall be an agreement between counterparties to execute the combination of a spot or forward FX OTC cleared transaction and a subsequent-dated forward FX OTC cleared transaction, where the buyer of the spot or forward currency pair becomes the seller of the subsequent-dated forward currency pair and the seller of the spot or forward currency pair becomes the buyer of the subsequent-dated forward currency pair. In other words, the counterparties are agreeing to the prices on the original trade date to exchange currency pairs for immediate (or nearby forward) delivery, and reverse the same transaction on some mutually agreed to subsequent “forward date,” which according to the definition above for a “forward” may be a standard delivery date or a broken delivery date.

TRADE

The term "trade" shall mean any purchase or sale of any commodity futures, options contract or swap made on the Exchange.

TRADE DATE OF AN FX OTC CLEARED TRANSACTION

The trade date of a foreign exchange (FX) over-the-counter (OTC) cleared transaction” is the date on which counterparties to the OTC transaction submit the FX OTC transaction to clearing as a cleared contract. Although in most instances counterparties may submit an FX OTC cleared transaction for clearing on the same date as the original trade for the FX OTC spot, forward and swap transaction, there is no requirement that it is submitted on the same date. Therefore, an FX OTC cleared transaction may be submitted on any date for clearing on the exchange.

TRADING DAY

A trading day shall mean the hours of trading as determined by the board for each contract starting with the opening of trading and ending with the close of trading for such contract.

TRADING SESSION

A trading session will mean either the pit trading session (the hours designated for open outcry trading for a product) and/or the Globex session (the hours on a particular trading day when a product can be traded on Globex).

U.S. GOVERNMENT SECURITIES BROKER-DEALER

A broker-dealer registered with the Securities and Exchange Commission or a state or federally chartered bank or savings association (or a state or federally licensed branch or agency of a foreign bank) that is subject to bank

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supervision that functions in the operation of markets for U.S. Treasuries. The functions may include, but are not limited to:

- Acting as a channel for the United States Department of the Treasury and investors in primary market for U.S. Treasuries (for example, by participating in auctions);
- Acting as providers of liquidity in primary and secondary markets for U.S. Treasuries; and
- Acting as providers of asset transformation and market making services in the market for U.S. Treasuries.

VALID VALUE DATE FOR DELIVERY OR CASH SETTLEMENT OF AN FX OTC CLEARED TRANSACTION

"Cleared only" foreign exchange (FX) over-the-counter (OTC) cleared transactions shall be delivered or cash settled for any valid value date mutually agreed to by buyer and seller, including all applicable standard valid value dates for delivery or cash settlement in futures offered for "trading and clearing."

(End Definitions)

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Chapter 1
Membership

100. GENERAL

Membership with full privileges in the CME Division shall be limited to 625; membership with full privileges in the IMM Division shall be limited to 813; membership with full privileges in the IOM Division shall be limited to 1287; and membership with full privileges in the GEM Division shall be limited to 413. Membership in the Exchange is a privilege subject to transfer only as authorized and on the conditions prescribed herein.

101. QUALIFICATIONS AND RESPONSIBILITIES

Any adult of good moral character, reputation and business integrity, with adequate financial resources and credit to assume the responsibilities and privileges of membership, is eligible for membership in the Exchange. A determination as to whether an applicant for membership or an applicant for an incentive program satisfies the Exchange requirements shall be made by the Membership Committee or by staff in the applicable department. A person approved for membership and an individual or entity approved for an incentive program shall be subject to all Exchange Rules. Notwithstanding a transfer of membership, a person shall continue to be responsible for violations of Exchange Rules committed by them while they were a member and also agrees to have any disputes, which arose while they were a member and which relate to or arise out of any transaction upon the Exchange or membership in the Exchange, resolved in accordance with Exchange Rules.

102. NON-MEMBER INVESTORS

A person may purchase a membership interest and be approved as a "Non-Member Investor" in the Exchange. The person shall file an Application to become a Non-Member Investor with the Membership Services Department (the "Department"). A Non-Member Investor is presumed to know all the rules and regulations of the Exchange and agrees to abide by and be subject to them. In the event that multiple individuals own a membership, such individuals shall appoint a designated individual who shall have the authority to sell, lease, pledge or otherwise dispose of or encumber the membership. Further, in the event that a legal entity owns a membership, such entity must provide the Department with appropriate corporate, partnership or other legal documentation indicating who has authority to sell, lease, pledge or otherwise dispose of or encumber the membership and any other documentation requested by the Department.

PROCEDURES FOR PURCHASE, SALE AND TRANSFER

103. PURCHASE OF MEMBERSHIP AND MECHANICS OF PURCHASE

103.A. Purchase of Membership

The prospective purchaser of a membership shall sign and file with the Department a Bid to Purchase which shall be guaranteed by: a) a clearing member of the Exchange; or b) the deposit of a certified or cashier's check; or c) a wire transfer; or d) for swap transactions, the deposit of a CME, IMM, or IOM membership and/or a wire transfer or a certified or cashier's check. The Bid to Purchase shall contain an agreement by the purchaser to take no recourse against the Exchange in the event their Application for Membership is rejected (except as provided in Section 8c of the Commodity Exchange Act).

For Purposes of this Chapter 1, a membership in the Exchange may only be purchased in conjunction with the CME Group Class B Share coupled to such membership. References to a "membership" shall include the associated CME Group Class B Share.

103.B. Mechanics of Purchase

The Department shall post the lowest offer to sell and the highest bid to purchase a membership in each Division. The Department shall match bids and offers and, in the event of an agreement, shall promptly notify the purchaser and the seller. Within two business days of such notification, the purchaser shall deposit with the Department the following:

a. A check, payable to the Exchange, for a transfer fee in an amount set by Exchange staff; and

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b. (1) A wire transfer, or a certified or cashier's check, if not previously deposited, or a check or a wire transfer from a clearing firm, payable to the Exchange, in the amount of the purchase price or, (2) if the seller has filed a written consent, a CME, IMM, or IOM membership if not previously deposited, owned free of any Rule 110 claims or any other liens, representing partial or complete satisfaction of the purchase price, and constituting a partial or complete exchange of membership(s) to that extent. Pursuant to such an exchange of membership(s), the purchaser and seller each must file an indemnification agreement in favor of the Exchange from a clearing member by which the clearing member agrees to pay all valid Rule 110 claims against the purchaser or the seller, as the case may be, up to the value at the time of the exchange of the membership(s) transferred by such purchaser or seller.

104. SALE OF MEMBERSHIP

A membership in the Exchange may only be sold as provided for in the Rules. When the owner or the legal representative of an owner desires to sell a membership, they shall sign and file with the Department an Offer to Sell, which shall set forth the price at which they are offering their membership, and contain an agreement to the conditions of sale set forth in these rules.

Upon the sale of a membership, any and all membership privileges granted by these rules shall terminate.

105. APPLICATION FOR MEMBERSHIP

105.A. Application Process for Members Accessing the Trading Floor

The applicant shall file an Application for Membership and the appropriate fee with the Department. The applicant shall agree to take no recourse against the Exchange in the event their application is rejected (except as provided in Section 8c of the Commodity Exchange Act), set forth all financial arrangements made in connection with the proposed purchase or transfer of the membership and agree to abide by the applicable rules and regulations of the Exchange and all amendments thereto.

Upon completion of the foregoing, the Department shall notify the membership by posting for a period of 20 days of the name of the applicant, the seller, the purchase price and the transfer type. The notice shall request the submission to the Department of claims against the seller or transferor arising out of Exchange transactions or any other relationship regulated by the Exchange.

During the posting period, the Department shall prepare a report on the qualifications of the applicant.

The Short Form application of a member who is transferring onto a membership may be approved by Exchange staff before the expiration of the posting period, provided the member obtains an indemnification agreement in favor of the Exchange from a clearing member to cover Rule 110 claims up to the value of the membership at the time of the transfer.

An applicant who wishes to procure a membership by purchase, or by transfer, may do so either prior or subsequent to approval for membership pursuant to Rule 107. An applicant who has acquired a membership prior to approval for membership shall become a member upon such approval. An applicant approved for membership prior to acquiring a membership shall become a member if, within thirty calendar days after approval for membership, they procure a membership; otherwise their membership shall be deemed vacated and the Exchange shall retain the membership application processing fee. Extensions of the 30-day period in which the applicant must acquire a membership may be granted by the Department.

105.B. Application Process for Members Not Requesting Access to the Trading Floor

The applicant shall file an Application for Membership and the appropriate fee with the Department. The applicant shall agree to take no recourse against the Exchange in the event their application is rejected (except as provided in Section 8c of the Commodity Exchange Act), set forth all financial arrangements made in connection with the proposed purchase or transfer of the membership and agree to abide by the applicable rules and regulations of the Exchange and all amendments thereto.

The applicant may receive temporary membership privileges which do not permit trading floor

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access upon the filing of a complete Application unless the Department has reason to believe that the applicant is not qualified for membership. An applicant that receives temporary membership privileges shall be subject to all of the rules of the Exchange including the rules related to the approval and rejection of an applicant. Such temporary membership privileges will expire upon the earlier of: 1) sixty days after the temporary membership privileges are granted; 2) a rejection of the applicant's membership application by the Membership Committee; or 3) notification that the application for membership has been approved. An applicant who receives temporary non-trading floor membership privileges who is subsequently rejected for membership shall reimburse the Exchange for the difference between trading and clearing fees paid by reason of the temporary membership status and the fees that would have been paid on the same transactions at the rates that would have otherwise prevailed.

The Department shall notify the membership by posting for a period of 20 days of the name of the applicant, the seller or transferor and the purchase price. The notice shall request the submission to the Department of claims against the seller or transferor arising out of Exchange transactions or any other relationship regulated by the Exchange. During the posting period, the Department shall prepare a report on the qualifications of the applicant.

The Application of a member who obtains a membership may be approved by the Department before the expiration of the posting period, provided the member obtains an indemnification agreement in favor of the Exchange from a clearing member to cover Rule 110 claims up to the value of the membership at the time of purchase or transfer.

An applicant who has acquired a membership prior to approval for membership shall become a member upon such approval. An applicant approved for membership prior to acquiring a membership shall become a member if, within thirty calendar days after approval for membership, they procure a membership; otherwise their membership shall be deemed vacated and the Exchange shall retain the membership application processing fee. Extensions of the 30-day period in which the applicant must acquire a membership may be granted by the Department.

105.C. Application for Floor Broker's or Floor Trader's License

Each membership applicant seeking a Floor Broker's or Floor Trader's license shall apply for registration as a Floor Broker or a Floor Trader with the National Futures Association. Individuals not accessing the Trading Floor are not required to obtain Floor Broker or Floor Trader registration.

106. TRANSFERS, SECURITY TRANSACTIONS, AND AUTHORIZATIONS TO TRANSFER OR SELL

Transfers of memberships may be made only in accordance with the following provisions. All of the applicable procedures and requirements for the sale and purchase of a membership as set forth in Chapter 1, including the provisions of Rule 110, shall apply to transfers made under this rule. A transfer, reinstatement or revocation of a transfer shall not be completed until all valid Rule 110 claims against a member are satisfied unless a properly completed Indemnification Form is filed by a member's qualifying clearing member.

106.A. Authorization to Sell

An Authorization to Sell ("Authorization Agreement") is a grant of authority by a member or applicant for membership that may be used only for the purposes specified in Rule 106.B. Authorization Agreements shall be effective only if executed on the form supplied by the Exchange and filed with the Department. Authorization Agreements shall be irrevocable without the written consent of the grantee.

A member or applicant for membership who executes an Authorization Agreement relinquishes their power to direct the sale of their membership. A grantee shall have all powers of sale that otherwise would have been available to the grantor. The Exchange shall act at the grantee's direction as if the grantee was the member-owner.

Private agreements between the grantor and the grantee shall not be recognized by the Exchange and shall not affect the rights of the Exchange or its members. The grantee shall be entitled, in addition to any other rights they may have under Rule 110, to the residual proceeds after all Rule 110 claims have been satisfied up to the amount of the outstanding debt owed.

106.B. Security Transactions

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A member, applicant for membership or a Non-Member Investor, may execute an Authorization Agreement, in favor of a clearing member, a financial institution or bank, or in favor of the member that financed the purchase of the membership and associated Class B Share in order to secure any outstanding debt connected with that financing.

A member, applicant for membership or a Non-Member Investor may execute an Authorization Agreement in favor of a member or clearing member to whom the member is indebted or may become indebted by reason of transactions upon the Exchange in order to secure such current or future debts.

106.C. Family Transfers

A member or Non-Member Investor may temporarily transfer their membership to a member of their immediate family who shall be subject to all Exchange rules and regulations. For purposes of this rule, immediate family members shall be limited to parents, siblings, children, grandchildren, grandparents, fathers-in-law, mothers-in-law, sons-in law, daughters-in-law and spouses.

Rule 106.C transfers shall be subject to the following terms and conditions:

1. The transferor may revoke the transfer upon written notice filed with the Department.
2. The transferor shall have the right at any time to have the transferee disqualified from trading by giving notice to the transferee's qualifying clearing member, who in turn must notify the Exchange pursuant to Rule 511.A.
3. The transfer shall be revoked and the membership shall revert to the transferor's estate or conservator upon official notice of the death or formally declared incompetence of the transferor. However, the legal representative of a deceased member's estate may transfer their membership pursuant to this Rule 106.C. during the pendency of probate.
4. Upon a transferor's expulsion from the Exchange, the transfer shall be revoked and the membership shall revert to the transferor who must sell the membership within 30 days.
5. Upon approval for membership, the transferee shall be treated as a member for all purposes, except that the transferee shall have no authority to sell, transfer or assign the membership. The transferor shall be considered the member and an assignment of the membership for membership purposes pursuant to Rules 106.J. or 902 shall not be terminated by the transferee.
6. The transferor may sell the membership at any time in accordance with the provisions of Rule 104 or transfer the membership and associated Class B Share pursuant to Rule 106. The proceeds of the sale of the membership and associated Class B Share will be distributed to the transferor following the settlement of all claims pursuant to Rule 110.
7. The transferred membership may be sold in accordance with Rule 133, and the proceeds may be applied as provided in Rule 110, to satisfy financial obligations of the transferee to the Exchange, to another member or to a clearing member arising out of the transferee's use of the membership in the event that such financial obligations have not been otherwise satisfied.

106.D. Futures Industry Transfers

A member or Non-Member Investor may temporarily transfer their membership to another member who shall be subject to all Exchange rules and regulations.

Transfers under this section shall be subject to the following terms and conditions:

1. The transferor may revoke the transfer upon written notice filed with the Department.
2. The transferor shall have the right at any time to withdraw the authority of the transferee to trade on the membership by giving notice to the transferee's qualifying clearing member and such clearing member must subsequently notify the Exchange pursuant to Rule **511.A.**
3. The transfer shall be revoked and the membership shall revert to the transferor's estate or conservator upon official notice of the death or formally declared incompetence of the transferor. However, the legal representative of a deceased member's estate may transfer their membership pursuant to this Rule 106.D. during the pendency of probate.
4. A transferor may not trade while on the trading floor.
5. The transferor may sell the membership at any time in accordance with the provisions of Rule 104 or transfer the membership pursuant to Rule 106. The proceeds of the sale of

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the membership will be distributed to the transferor following the settlement of all claims pursuant to Rule 110.

6. The transferred membership may be sold in accordance with Rule 133, and the proceeds may be applied as provided in Rule 110, to satisfy financial obligations of the transferee to the Exchange, to another member or to a clearing member arising out of the transferee's use of the membership in the event that such financial obligations have not been otherwise satisfied.
7. The transferee must be qualified to trade by a clearing member acceptable to the transferor. The transferor may not assign the membership for membership purposes pursuant to Rules 106.J. or 902.
8. A transferee shall place all trades on the books of their qualifying clearing member unless written authorization to the contrary from said clearing member and from the transferor has been filed with the Department. Failure to adhere to the requirements of this rule and Rule 511 shall exclude a clearing member not qualifying the transferee from receiving proceeds under Rule 110.
9. Upon a transferor's expulsion from the Exchange, the transfer shall be revoked and the membership shall revert to the transferor who must sell the membership within 30 days.
10. Except as provided in Rule 135, any transferee approved for membership pursuant to this Rule 106.D. after January 7, 1985, who was not a member as of January 7, 1985, shall be eligible to execute trades only for their own account for a cumulative period of twelve (12) months following their election to membership unless exempted there from by the Membership Committee.
11. A lease entered into on or after February 1, 1996, which is terminated by a transferee prior to its expiration date, shall be controlled by the following early cancellation payment obligation:

    A transferee who unilaterally terminates a lease remains obligated to make the agreed rental payments to transferor until the end of the term of the lease; however, transferee's obligation to make such rental payments shall be reduced by the amount of rental payments received by transferor if transferor is able to lease the membership to another person during the remaining term of the original lease. Transferor must use their best efforts to lease the membership to another person as soon as possible and at the highest possible rental obtainable based on similar leases, if any, then being executed.

12. A lessor shall notify the Exchange, in a manner designated by the Exchange, of the terms of a new lease agreement or any renewal of a lease agreement within two (2) business days of the negotiation of the lease agreement, or renewal thereof. A lessor's failure to comply with this Rule 106.D.12 may result in the issuance of a warning letter to the lessor. A lessor may then be subject to an automatic fine of $500 and $1000 respectively for a second and third violation of this rule within a rolling 12-month period from the issuance of the warning letter. Repeated violations of this rule may be referred to a disciplinary committee.
13. For leases expiring on or after December 31, 2006, unless otherwise previously agreed to by the transferor and the transferee, notice must be provided by the parties of their intention to continue a leasing arrangement at least ten (10) days prior to the expiration of the current lease term. If either party fails to provide such notice, it is assumed that the lease will not be renewed upon its expiration. Terms of the renewal, if any, will be subject to negotiation between the parties.

106.E. Unconditional Bequests and Bona Fide Gifts of Membership

A member or Non-Member Investor may make a bona fide gift or bequest of membership. The bona fide gift may be made only to immediate family members as defined in Rule 106.C. Unless otherwise required by law, a letter affirming the gift or Letters of Office from the Probate Court and a letter from the decedent's personal representative allowing the transfer will be required as a precondition of transfer.

106.F. Clearing Member

A membership may be owned by a clearing member, or a person or an entity having an acceptable proprietary interest in the clearing member. The membership may be transferred

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under this Rule provided that: (1) the transfer is approved by Exchange staff; and (2) the transferee is approved pursuant to the rules of the Exchange.

106.G. Transfer to Wholly-Owned Entities

A membership may be transferred to an entity which is wholly-owned by the member or their immediate family members as that term is used in Rule 106.C. Transfers pursuant to this authorization shall be limited to transfers pursuant to Rules 106.C., D. or E.

A 106.G. transferee may assign the membership for membership purposes in accordance with Rules 106.J. and 902 except in circumstances where the transfer has been made pursuant to Rule 106.D.

106.H. Trading Member Firm

A membership may be owned by, or two memberships may be leased by, a trading member firm or, if the trading member firm is a pool or fund, the investment manager of the pool or fund. The memberships may be held in the name of the trading member firm or transferred among its principals and employees provided that: (1) the transfer is approved by Exchange staff; (2) the transferee is approved pursuant to the rules of the Exchange; and (3) the transfer is for the legitimate business purposes of the firm. The firm shall have the right, at any time, to withdraw the authority of the transferee to trade on a membership owned or leased by the firm, but must withdraw such authority upon termination of their employment or other association with the firm. Notice of the withdrawal of the authority of the transferee to trade on a membership owned or leased by the firm must be given to their qualifying clearing member who in turn must notify the Department pursuant to Rule 511.A. The trading member firm shall designate on a form provided by the Exchange a representative who shall be authorized to deal with the Exchange with respect to the membership transferred under this Section.

The proceeds of the sale of a membership which has been assigned in order to qualify a Rule 106.H. trading member firm shall be subject to Rule 110 claims against both the owner of the membership and the Rule 106.H. trading member firm.

A Rule 106.H. membership may not be transferred pursuant to any other provision of Rule 106. The membership may not be assigned for membership purposes under Rules 106.J. or 902.

Rule 106.H. trading member firm benefits apply only to the firm's member firm trading and not to the trading of any affiliates, subsidiaries or customers. All such positions of the trading member firm must be carried by a clearing member(s) in accounts separate from positions of affiliates, subsidiaries, customers and other entities.

Any holder or transferee of a Rule 106.H. membership may not solicit or contact customers from the floor of the Exchange unless the trading member firm is an Introducing Broker or Futures Commission Merchant as those terms are defined in Section 1a of the Commodity Exchange Act and/or 17 C.F.R. 1.3.

A Rule 106.H. trading member firm may not hold itself out to the public as a clearing member.

Exchange staff may grant exemptions from the requirements of this Rule.

106.I. Affiliate Member Firm

An "affiliate" shall be defined to include a firm that either: owns, directly or indirectly, 100% of a clearing member with shares or Rule 106.J. equity member firm or has 100% ownership, direct or indirect, in common with a firm that owns, directly or indirectly, 100% of a clearing member with shares or Rule 106.J. equity member firm. "Clearing members with shares" means clearing members that maintain CME Group Class A shares in accordance with CME Rule 106.J. Equity Member Firm requirements in order to receive equity member rates and/or clearing members that pay the monthly Equity Member Subscription Rate described in Rule 106.J.

A membership may be owned by a clearing member with shares, or a Rule 106.J. equity member or affiliate firm under this Rule. The membership may be held in the name of the firm or principals or employees of an affiliate and be transferred among its principals and employees provided that: (1) the transfer is approved by Exchange staff; (2) the transferee is approved for membership pursuant to the rules of the Exchange; and (3) the transfer is for the legitimate business purposes of the firm. The affiliate firm shall have the right, at any time, to withdraw the authority of the transferee to trade on the membership owned by the clearing member with shares, Rule 106.J. equity member or affiliate firm, but must withdraw such

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authority upon termination of their employment or other association with the firm. Notice of the withdrawal of the authority of the transferee to trade on the membership owned by a clearing member with shares, Rule 106.J. equity member or affiliate firm must be given to their qualifying clearing member, and such clearing member must subsequently notify the Department pursuant to Rule 511.A. The clearing member with shares, Rule 106.J. equity member or affiliate firm shall designate on a form provided by the Exchange a representative who shall be authorized to deal with the Exchange with respect to the membership held under this Section.

The proceeds of the sale of a membership which is used to qualify a Rule 106.I. affiliate member firm shall be subject to Rule 110 claims against both the owner of the membership and the Rule 106.I. affiliate member firm.

A Rule 106.I. membership may not be transferred pursuant to any other provision of Rule 106. The membership may not be assigned for membership purposes under Rules 106.H., 106.J., 106.R., 106.S. or 902.

Rule 106.I. firm benefits apply to the firm trading activity of any affiliate as defined in this Rule that is registered with the Exchange. All such positions of the firm and its affiliates must be carried by a clearing member(s) in accounts separate from positions of subsidiaries, customers and other entities.

A Rule 106.I. affiliate member firm may not hold itself out to the public as a clearing member.

Exchange staff may grant exemptions from the requirements of this Rule.

106.J. Equity Member Firm

A firm may qualify as an equity member firm if two CME memberships, two IMM memberships, two IOM memberships, one GEM membership and 20,000 CME Group Class A Shares or, if the equity member firm is a fund, pool or other collective investment vehicle, 30,000 shares, are assigned for the firm's membership privileges. A higher Division membership may be substituted for a lower Division membership to satisfy these requirements:

A CME Rule 106.J. equity member firm (excluding a fund, pool or other collective investment vehicle) shall at all times have assigned to it at least 30,000 CME Group Class A Shares if it is also either: (a) a NYMEX clearing member with shares or NYMEX Rule 106.J. member firm or (b) a CBOT clearing member with shares or CBOT member firm that has a 20,000 share requirement. If the CBOT member firm has an 8,750 share requirement, the combined share requirement will be 28,750.

A CME Rule 106.J. equity member firm that is a fund, pool or other collective investment vehicle shall at all times have assigned to it at least 45,000 CME Group Class A Shares if it is also either: (a) a NYMEX clearing member with shares or NYMEX Rule 106.J. member firm or (b) a CBOT clearing member with shares or CBOT Rule 106.S. equity member firm.

A CME Rule 106.J. equity member firm (excluding a fund, pool or other collective investment vehicle) shall at all times have assigned to it at least 40,000 CME Group Class A Shares if it is also both: (a) a NYMEX clearing member with shares or NYMEX Rule 106.J. member firm and (b) a CBOT clearing member with shares or CBOT member firm that has a 20,000 share requirement. If the CBOT member firm has an 8,750 share requirement, the combined share requirement will be 38,750.

A CME Rule 106.J. equity member firm that is a a fund, pool or other collective investment vehicle shall at all times have assigned to it at least 60,000 CME Group Class A Shares if it is also both: (a) a NYMEX clearing member with shares or NYMEX Rule 106.J. member firm and (b) a CBOT clearing member with shares or CBOT Rule 106.S. equity member firm.

At least one CME, one IMM, one IOM and one GEM membership and 50% of the CME Group Class A Shares required for equity membership pursuant to this Rule must be owned by the equity member or a person, including a parent company, with an acceptable proprietary interest in such equity member, or if the equity member firm is a fund, pool or other collective investment vehicle, the investment manager of the fund, pool or other collective investment vehicle. One CME, one IMM, and one IOM membership and 50% of the CME Group Class A Shares required for equity membership may be independently assigned.

A member firm may pay an Equity Member Subscription Rate as published in the CME fee schedule in lieu of holding CME Group Class A Shares referenced above. The Equity Member Subscription Rate will be applied per member, per month, per Exchange. Member firms

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choosing to pay the Equity Member Subscription Rate must file an application with the Department. The Exchange will have discretion regarding applying the appropriate rate.

If the fund management company is the equity member firm, it may designate a fund, pool or other collective investment vehicle fund within its family of funds to receive its membership benefits.

The memberships owned by the Rule 106.J. equity member firm or a person, including a parent company, with an acceptable proprietary interest in the equity member or the investment manager of a fund, pool or other collective investment vehicle may be transferred under this Rule provided that: (1) the transfer is approved by Exchange staff; and (2) the transferee is approved pursuant to the rules of the Exchange. The firm shall have the right, at any time, to withdraw the authority of the transferee to trade on a firm-owned membership, but must withdraw such authority upon termination of their employment or other association with the firm. Notice of the withdrawal of the authority of the transferee to trade on a firm-owned membership must be given to their qualifying clearing member who in turn must notify the Department pursuant to Rule 511.A. The equity member firm shall designate on a form provided by the Exchange a representative who shall be authorized to deal with the Exchange with respect to the membership transferred under this Section.

The proceeds of the sale of a membership which has been assigned in order to qualify a Rule 106.J. equity member firm shall be subject to Rule 110 claims against both the owner of the membership and the Rule 106.J. equity member firm.

A Rule 106.J. membership may not be transferred pursuant any other provision of Rule 106. The membership may not be assigned for membership purposes under Rule 902.

Rule 106.J. equity member firm benefits apply to the equity member firm's member firm trading and the trading account of any 100% wholly owned subsidiaries of the equity member firm that are registered with the Exchange. The Rule 106.J. equity member firm benefits do not apply to the trading of any affiliates, parent companies or customers of the equity member firm. All such positions of the equity member firm or its 100% wholly owned subsidiaries must be carried by a clearing member(s) in accounts separate from positions of affiliates, subsidiaries, customers and other entities.

Any holder or transferee of a Rule 106.J. membership may not solicit or contact customers from the floor of the Exchange unless the equity member firm is an Introducing Broker or Futures Commission Merchant as those terms are defined in Section 1a of the Commodity Exchange Act and/or 17 C.F.R. 1.3.

A Rule 106.J. equity member firm may not hold itself out to the public as a clearing member.

Exchange staff may grant exemptions from the requirements of this Rule.

106.K. Transfer to a Trust

A member may transfer their membership to an Estate Planning Vehicle for which the member is the grantor. An Estate Planning Vehicle is a trust established primarily for the benefit of the grantor's family and friends and charitable beneficiaries. A membership properly held within an Estate Planning Vehicle may be transferred to one successor Estate Planning Vehicle for which the member is the grantor within one year of the member's death. The grantor (or the grantor's personal representative) and the trustee (and any successor) shall complete the trust transfer agreement and certification provided by Exchange staff. The grantor shall comply with any request to produce the Estate Planning Vehicle or information regarding the Estate Planning Vehicle made by Exchange staff.

If such a transfer is made by a bona fide gift or bequest, it shall also be subject to the requirements of Rule 106.E.

The grantor's liability to the Exchange under Rule 439 shall continue with respect to any claim arising out of an act or omission occurring prior to such transfer, and the membership will continue to be treated as the asset of the grantor for the purposes of Rule 439 and for otherwise meeting any obligations to the Exchange arising out of the grantor's use of the membership prior to the transfer to the trust, including fines imposed with respect to conduct occurring prior to the transfer.

A membership held pursuant to a transfer under this section may be assigned for membership purposes under Rules 106.J. or 902 or reinstated to the transferor pursuant to this section.

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The transfer shall be revoked and the membership shall revert to the transferor upon official notice to the Exchange that the trust has been revoked. The membership must be transferred out of the trust within 90 days of the closing of the member's estate.

106.L. Transfer of Membership Created by the Membership Rights Program

Exchange staff is authorized to allow the transfer of the ownership of record of any membership created by the combination of four quarter memberships pursuant to the Membership Rights Program provided that the transferor and the transferee have each continuously maintained at least a quarter interest in the membership from the date of the combination of the membership.

106.M. Transfer to Joint Tenants With Right of Survivorship

A member may transfer their membership to themselves and a member of their immediate family, as defined in Rule 106.C., as joint tenants with right of survivorship.

The joint tenants shall designate on a form provided by the Exchange which one of them shall be authorized to deal with the Exchange with respect to the membership transferred under this Section. The designee must qualify for membership by satisfying the requirements of Chapter 1 of these rules, and shall be treated as a member for all purposes. In the designation form, the joint tenants shall acknowledge that the designee shall have the exclusive right to transfer the membership or to execute an Authorization to Sell pursuant to Rule 106.A. and that the Exchange shall have no liability to the non-designee in the event of such transfer or execution or the mishandling of the membership by the designee. The joint tenants may at any time change such designation in writing signed by both of them, and each such change shall be deemed a transfer for the purposes of these rules. Upon such change in designation, the new designee must qualify for membership by satisfying the requirements of Chapter 1 of these rules.

Whether or not the transferor is the designee, the transferor's liability to the Exchange under Rule 439 shall continue with respect to any claim arising out of an act or omission occurring prior to a transfer under this rule, and the membership will continue to be treated as an asset of the transferor for the purposes of Rule 439 and for otherwise meeting any obligations to the Exchange arising out of the transferor's use of the membership prior to such transfer, including fines imposed with respect to conduct occurring prior to the transfer.

Upon receipt of satisfactory proof of the death of a joint tenant, the Exchange will transfer the membership to the survivor.

Upon receipt by the Exchange of written notice signed by both joint tenants terminating joint ownership of the membership transferred under this section and instructing the Exchange to transfer the membership to one of the joint tenants as sole owner, the Exchange shall transfer such membership pursuant to such instructions.

A membership held pursuant to a transfer under this section may not be assigned for membership privileges under Rules 106.J. or 902.

106.N. GEM Institutional Access Member Firm

A GEM membership may be owned by a GEM Institutional Access member firm. The membership may be held in the name of the member firm or may be transferred to a principal or employee of the member firm and transferred among its principals and employees provided that: (1) the transfer is approved by Exchange staff, (2) the transferee is approved pursuant to the rules of the Exchange; (3) the transfer is for the legitimate business purposes of the firm; and (4) the firm is not engaged in futures customer business with U.S. customers. The firm shall have the right, at any time, to withdraw the authority of the transferee to trade on the membership, but must withdraw such authority upon termination of their employment with the firm. Notice of the withdrawal of the authority of the transferee to trade on the membership must be given to the Department. The member firm shall designate on a form provided by the Exchange a representative who shall be authorized to deal with the Exchange with respect to the membership transferred under this Section.

A Rule 106.N. membership may not be transferred pursuant to any other provision of Rule 106. The membership may not be assigned for membership purposes under Rules 106.J. or 902.

Rule 106.N. member firm benefits apply only to the firm's member firm trading and not to the trading of any affiliates, subsidiaries or customers. All such positions of the member firm must

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be carried by a clearing member(s) in accounts separate from positions of affiliates, subsidiaries, customers and other entities.

A Rule 106.N. firm may not hold itself out to the public as a clearing member.

106.O. Transfer of GEM Membership

Ownership of record of a GEM membership that was formed by the combination of GEM fractional interests may be transferred to any of the members whose fractional interests were combined to form that GEM membership.

106.P. Transfer to a Family Limited Partnership

A member may transfer their membership to a Family Limited Partnership ("FLP") with respect to which all partners are members of the member's family who would be eligible for a family transfer from the member pursuant to Rule 106.C. The limited partnership agreement or other document(s) governing the FLP shall at all times prohibit transfers of an interest in the FLP to any person who is not eligible pursuant to Rule 106.C and shall state that (1) the FLP's interest in the membership shall at all times be subject to all of the rules of the Exchange, as may be amended, including, but not limited to, Rule 110 and, if the membership is assigned to a member firm for membership purposes, Rules 106.J. and 902; (2) management of the FLP shall be vested exclusively in a managing general partner, who must qualify for membership by satisfying the requirements of Chapter 1 of these rules; and (3) the Exchange shall have no liability to the partners for any loss, damage, or expense resulting from any acts or omissions by the managing general partner or any person acting by or through the authority of a general partner. The transferor and the managing general partner (and any successor) shall each provide in the form provided by the Exchange a certification that the FLP acquires the membership subject to all of the rules of the Exchange and that the FLP is in compliance with the requirements of this Rule. The FLP also may transfer the membership back to the transferor.

If the transfer of a membership to the FLP is made by a bona fide gift or bequest, it shall also be subject to the requirements of Rule 106.E.

Transfer of a membership pursuant to this rule shall not relieve the transferor of any liability to the Exchange under Rule 439 with respect to any claim arising out of an act or omission occurring prior to such transfer, and the membership will continue to be treated as the asset of the transferor for the purposes of Rule 439 and for otherwise meeting any obligations to the Exchange arising out of the transferor's use of the membership prior to the transfer to the FLP, including fines imposed with respect to conduct occurring prior to the transfer.

A membership held pursuant to a transfer under this section may be assigned for membership purposes under Rules 106.J. and 902.

106.Q. [Reserved]

106.R. Electronic Corporate Member Firm

A membership may be owned by, or two memberships may be leased by, an electronic corporate member firm. The membership must be held in the name of the firm. The electronic corporate member firm shall designate on a form provided by the Exchange a representative who shall be authorized to deal with the Exchange with respect to such memberships.

A Rule 106.R. membership may not be transferred pursuant to any other provision of Rule 106. The membership may not be assigned for membership purposes under Rules 106.J. or 902.

Rule 106.R. benefits apply only to an electronic corporate member firm's member firm trading and not to the trading of any affiliates, subsidiaries or customers. All such positions of the electronic corporate member firm must be carried by a clearing member(s) in accounts separate from positions of affiliates, subsidiaries, customers and other entities.

A Rule 106.R. electronic corporate member firm may not hold itself out to the public as a clearing member.

106.S. Family of Funds Member Firm

A membership may be owned under this Rule by: (1) a clearing member or Rule 106.J. equity member firm that is a hedge fund or a fund management company; (2) a fund management company of a clearing member or Rule 106.J. equity member firm; or (3) a fund that is part of the family of funds of a clearing member or Rule 106.J. equity member firm. The membership

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may be held in the name of the fund management company or an approved fund and may be transferred to a principal or employee of the fund management company or an approved fund and be transferred among their principals and employees provided that: (i) the transfer is approved by Exchange staff; (ii) the transferee is approved pursuant to the rules of the Exchange; and (iii) the transfer is for the legitimate business purposes of the fund management company or fund. The fund management company or the fund shall have the right, at any time, to withdraw the authority of the transferee to trade on the membership, but must withdraw such authority upon termination of their employment or other association with the company. Notice of the withdrawal of the authority of the transferee to trade on the membership must be given to their qualifying clearing member who in turn must notify the Department pursuant to Rule 511.A. The fund management company or the fund shall designate on a form provided by the Exchange a representative who shall be authorized to deal with the Exchange with respect to the membership transferred under this Section.

The proceeds of the sale of a membership which is used to qualify a Rule 106.S. family of funds member firm shall be subject to Rule 110 claims against both the owner of the membership and the Rule 106.S. family of funds member firm.
A Rule 106.S. membership may not be transferred pursuant to any other provision of Rule 106. The membership may not be assigned for membership purposes under Rules 106.J. or 902.

For each CME, IMM or IOM membership owned by such fund management company or fund over the requirement needed to qualify as a clearing or Rule 106.J. equity member firm, Rule 106.S. benefits shall apply to the trading activity of up to five funds within the family of funds managed by the fund management company. All positions of each fund must be carried by a clearing member(s) in accounts separate from positions of affiliates, subsidiaries, customers and other funds within the family of funds.

A Rule 106.S. family of funds member firm may not hold itself out to the public as a clearing member.

Exchange staff may grant exemptions from the requirements of this Rule.

107. APPROVAL OF APPLICANT

Department staff shall review and approve applicants for membership on the Exchange. Such approval shall be based upon admission criteria established by the Membership Committee. The Membership Committee shall review applicants for membership not meeting the staff-administered admission criteria.

Department staff shall inquire into and be satisfied with respect to the reputation and financial responsibility of the applicant and the details of the financial arrangements made in connection with the purchase or transfer of the membership. After review of all of the information, a decision shall be made as to whether the applicant is qualified for membership.

An applicant not approved for membership by Department staff shall be referred to a panel of the Membership Committee. A panel of the Membership Committee shall consist of two members and a chairman, who shall have a vote. A unanimous vote of the panel is required for approval of the applicant.

An applicant approved for membership either by Department staff or the Membership Committee, as applicable, shall assume the responsibilities and privileges of membership once a membership is obtained.

108. [RESERVED]

109. REJECTION OF APPLICANT

If an applicant is rejected by the Membership Committee panel, the applicant may appeal the decision to the full Membership Committee. The Membership Committee shall decide, by majority vote, whether the applicant is qualified for membership. The decision of the Membership Committee shall be final. An applicant rejected by the Membership Committee may be reconsidered for membership if new or additional information is subsequently brought to the attention of the Membership Committee. If an applicant is rejected for membership or if for any reason their application is withdrawn, the Exchange shall retain the processing fee and the applicant shall assume all risk of gain or loss from the resale of any membership purchased by them prior thereto.

If the applicant executed and filed an Authorization to Sell pursuant to Rule 106.A. with the

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Department in connection with the financing of the purchase of a membership, then the proceeds of any sale of such membership shall be paid to the grantee, up to the amount of the debt, including interest.

110. CLAIMS AGAINST MEMBERSHIP, APPLICATION OF PROCEEDS

For the purposes of this rule "sale" shall include a sale made pursuant to Rule 104 or a transfer made in accordance with the provisions of Rule 106; "seller" shall include owners of a membership and firms that have membership privileges pursuant to Rules 106. F., G., H., I., J., N., R. or S.; and "claim" shall be limited to claims involving incidents that occurred prior to the sale of the membership and which arose in connection with Transactions on the Exchange or membership in the Exchange. For purposes of this Rule, "Transactions on the Exchange" shall include, but are not limited to, transactions receiving preferential clearing fees as a result of the membership, regardless of the party entitled to receipt of such preferential fees. Claims resulting from conduct subsequent to the sale of a membership may not be asserted against that membership or its proceeds. All claims against the membership or proceeds resulting from the sale of the membership shall be submitted in writing to the Department within 20 days of the posting of notice of the sale of said membership. At the conclusion of the 20-day claim filing period, authorized Exchange staff shall conduct an investigation of all claims properly filed against the membership sale or its proceeds. This investigation shall be completed within 20 days unless the investigation cannot be resolved within that period.

The total proceeds of the sale, or in the case of a transfer, the value at the mid-point of the bid-offer spread as of the date of the transfer, of the membership shall be applied to the following purposes and in the following order of priority:

a. Payment of all 1) debts owed to the Clearing House, if the membership transferred was assigned to the Clearing House pursuant to Rule 902; and 2) dues, fines, contributions, charges and other indebtedness owed to the Exchange or the CME Gratuity Fund;

b. Payment of any indebtedness to the clearing member who last qualified the selling member prior to the sale arising out of: (i) a pledge of such membership as collateral security on such indebtedness, or (ii) a deficit which authorized Exchange staff determines to have arisen directly out of Transactions on the Exchange;

c. Payment of amounts due to other clearing members on claims filed which authorized Exchange staff determines to have arisen directly out of Transactions on the Exchange;

d. Payment of amounts due to members and member firms on claims filed which authorized Exchange staff determines to have arisen directly out of Transactions on the Exchange; and

e. Payment of amounts due to public customers of the seller or public customers of any party receiving preferential clearing fees as a result of the membership based on claims filed by such customers or based on reports of the Market Regulation Department, which claims are determined by authorized Exchange staff to be based upon misappropriation of customer funds, improperly executed transactions, unpaid credit balances, or other similar matters, directly related to Transactions on the Exchange.

No other claims against the proceeds of the sale of a membership shall be recognized and administered by the Exchange except where the seller gives the Exchange permission to use the proceeds to pay an outstanding tax lien, but the creditors of the seller of a membership not falling in the foregoing categories may pursue other legal means of securing payment of their obligations.

Authorized Exchange staff shall make a final determination of all claims filed in time or reported by the Market Regulation Department and the Department against the proceeds of the sale of a membership.

Except as provided in Rule 913 or where Exchange staff is aware of an outstanding tax lien, Exchange staff shall make a distribution of such proceeds within 40 days after receiving notification and confirmation of the sale of the membership, unless claims to the proceeds are not resolved within that period. If, however, at such time an Exchange disciplinary proceeding is pending against the seller or any party receiving preferential clearing fees as a result of the membership, or, based upon a pending investigation, is highly probable, or if a legal proceeding, in respect to which the indemnification provisions of Rule 439 would operate, is pending, has been announced or is highly probable, then the Exchange staff shall retain so

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much of the proceeds as determined by staff in order to satisfy such obligations until such time as the pending matter is concluded.

Distribution of proceeds shall be made by the payment of claims in the categories listed in this rule to the extent the proceeds from the sale are sufficient to meet those obligations. If the proceeds of the sale of a membership are insufficient to pay all amounts determined to be due under the categories listed in this rule, the proceeds shall be applied to pay the full amounts determined to be due under subparagraphs a, b, c, d and e in the priority named. If the proceeds are insufficient to pay the amounts determined to be due under any priority, the claims due under that priority shall be paid pro rata, and the remaining priorities shall be left unpaid. In determining the amount of any claim, the Exchange staff shall first deduct the fair cash value of any collateral held by that claimant. Creditors of the seller of a membership whose obligations are not fully satisfied pursuant to this paragraph may pursue other legal means of securing payment of their obligations.

The surplus, if any, shall be paid to the person whose membership was sold or their legal representative or a 106.A.-B. grantee, as applicable, upon the execution of a satisfactory release. The Exchange staff's determination and allowance of claims hereunder shall be final. The death, incompetence, expulsion, suspension, insolvency or bankruptcy of a member shall not affect the rights of claimants under this rule.

111.— 119. [RESERVED]

PRIVILEGES AND RESPONSIBILITIES

120. MEMBERSHIP CATEGORIES

There are four categories of membership: CME, IMM, IOM and GEM. CME Division membership privileges extend to all CME products; IMM Division membership privileges are limited to products assigned to that Division, the IOM Division and the GEM Division by the Board; IOM Division membership privileges are limited to products assigned to that Division and the GEM Division by the Board; and GEM Division membership privileges are limited to products assigned to that Division by the Board. CME, IMM, IOM and/or GEM members may also be granted Expanded-Access Product privileges in connection with designated products listed by CBOT.

A member who trades products on Globex in which they do not have membership privileges is not entitled to member's rates for such trades.

121. MEMBERSHIP PRIVILEGES

Membership in the Exchange entitles the member to certain privileges including the right:

a. To access the trading floor if properly qualified by a clearing member;

b. To act as a Floor Broker and/or Floor Trader in accordance with Exchange rules; and

c. To receive member or lessee fee rates in accordance with Exchange requirements.

122. MEMBERSHIP DUES AND ASSESSMENTS PAYABLE

Dues and other amounts owed to the Exchange, including CME Gratuity Fund dues and assessments, are payable upon receipt of the invoice. Members in arrears 60 days after the invoice date may forfeit all membership privileges, including the privilege of accessing the floor and reduced clearing and trading fees, including Globex fees. Exchange staff shall use reasonable efforts to notify the member before any privileges are forfeited.

Each permit holder's employing clearing member is responsible for the payment of the permit holder's dues, fees and assessments.

123. COMPLIANCE WITH THE COMMODITY EXCHANGE ACT

All members of the Exchange shall comply with the provisions of the Commodity Exchange Act and the rules and regulations duly issued pursuant thereto by the CFTC, including the filing of reports, maintenance of books and records, and permitting inspection and visitation by duly authorized representatives of the CFTC.

124. VIOLATIONS OF COMMODITY EXCHANGE ACT

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Within a reasonable time following the receipt of final notice under Section 6(c) of the Commodity Exchange Act from the CFTC that any person has been found guilty of violating the provisions of the Commodity Exchange Act, Exchange staff shall take the necessary action to effectuate the order of the CFTC, as applicable, and shall report such action to the Board.

125. GRATUITY FUND

Every person becoming a member of the Exchange who is not leasing a membership and every person becoming a member of any Division of the Exchange, whether now or hereafter existing, who at the time of their admission has not attained their 55th birthday, shall automatically become a member of Chicago Mercantile Exchange Inc. Gratuity Fund and shall be required to pay the initial fee and all assessments imposed, in compliance with the by-laws of said Gratuity Fund and shall be bound by said by-laws and all amendments thereof and by such other rules and regulations as may be adopted by the Board of Directors of the Exchange or the Gratuity Fund in conformity with such by-laws. Every person who becomes a member of the Gratuity Fund shall be required to continue as a member thereof so long as they continue as a member of the Exchange or any of its Divisions.

126. MEMBERSHIP EDUCATION PROGRAMS

A member's right to access the trading floor requires that they first attend an initial educational program respecting CFTC and Exchange trading rules, federal, Exchange, and administrative sanctions for violating rules, and members' legal and professional responsibilities concerning treatment of customer orders and handling of customer business.

Continued access requires members to comply with the ethics standards set forth in Appendix B to Part 3 of the CFTC's Regulations-Statement of Acceptable Practices, or any equivalent ethics training.

127. TRADING AND SOLICITATION PRIVILEGES[1]

A member shall have the right, subject to the rules of the Exchange, to trade as principal and as broker for others by open outcry only with respect to products assigned to their membership division or designated Expanded-Access Products. The Exchange shall designate the CME products which CME and CBOT members may solicit from the combined CME and CBOT trading floor. In order to solicit customer business, the member must have proper industry registration. All solicitations must take place from the trading floor or the premises of an entity registered to conduct customer business. Solicitations occurring from the premises of an entity registered to conduct customer business must be on behalf of the entity or one of its properly registered affiliates and such entity or affiliate must be an NFA member if required by NFA rules.

128-129. [RESERVED]

130. REQUIRED NOTICES BY MEMBER FIRMS AND SUSPENSION OF MEMBER FIRM PRIVILEGES

Rule 106.H., I., J., N., R., and S. member firms shall notify the Financial and Regulatory Surveillance Department prior to any proposed merger, acquisition, consolidation, combination, sale, or any other change of ownership involving such Rule 106.H., I., J., N., R., or S. firm.

Rule 106.H., I., J., N., R., and S. member firms shall notify the Financial and Regulatory Surveillance Department in a timely manner of any material change in key personnel who are responsible to act on behalf of the member firm.

If any Rule 106.H., I., J., N., R., or S. firm:

- has notified the Exchange or the Exchange otherwise becomes aware of a significant event as defined in Rule 442; or
- that is an FCM fails to meet CFTC minimum financial requirements in the opinion of the Financial and Regulatory Surveillance Department; or
- neglects to promptly furnish a statement upon request,

[1] Adopted April 2008.

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membership privileges of the Rule 106.H., I., J., N., R., or S. firm may be suspended, subject to approval of any two of the following individuals: the Chief Executive Officer, Global Head of Clearing, or the Chairman of the Board. Any two of these individuals may reinstate the membership privileges of such a suspended member firm, in their discretion, if the suspended member firm provides evidence satisfactory to the Financial and Regulatory Surveillance Department of its financial responsibility or that it meets CFTC minimum financial requirements.

INVOLUNTARY SALE

131. EXPULSION FOR FRAUD OR DISHONESTY PRIOR TO ELECTION TO MEMBERSHIP

A member or a firm with membership privileges who is found guilty of fraud or dishonest conduct by any court, commodity or securities exchange or related clearing organization, the Securities and Exchange Commission, the Commodity Futures Trading Commission or the securities commission or equivalent authority of any state, territory, the District of Columbia or foreign country, the National Futures Association, the Financial Industry Regulatory Authority, or any self-regulatory or regulatory organization prior to becoming a member and of failing to make full disclosure thereof in their or its application for membership, or who is found guilty of having made a false statement of a material fact in or in connection with their application, may be expelled from membership in the Exchange by a Panel of the Business Conduct Committee.

132. SALE OF MEMBERSHIP AT DIRECTION OF REGULATORY AUTHORITY

If the Exchange is apprised by a regulatory authority with jurisdiction over the owner of a membership that said membership was obtained unlawfully based on the laws of the jurisdiction in which the owner of a membership is located or where the regulatory authority directs that the owner of the membership relinquish ownership, the Chief Executive Officer may order the membership to be sold and the proceeds applied as provided in Rule 110. If, within 30 days of such order of sale, the owner voluntarily sells the membership, the ordered sale of the membership shall be cancelled. If the membership is not sold by the owner within 30 days of the order, then the membership involved shall be sold by the Exchange to the highest bid on file with the Department for such membership upon the opening of the seat sale market on the sixth business day after expiration of the 30-day period**.**

133. SALE OF MEMBERSHIP WHEN MEMBER DEFAULTS

If Exchange staff determines that a member or a firm that has membership privileges is in default upon any financial obligation due to the Exchange or any financial obligation to another member or to a clearing member in connection with transactions on the Exchange, the Chief Executive Officer may order the membership of the defaulting member or firm sold and the proceeds applied as provided in Rule 110. If, within 30 days of such order of sale, the defaulting member or firm satisfies the indebtedness and provides proof of such satisfaction to staff, the ordered sale of the membership shall be cancelled. If full payment is not made within the 30-day period, then the membership involved shall be sold by the Exchange to the highest bid on file with the Department for such membership upon the opening of the seat sale market on the sixth business day after expiration of the 30-day period. If the proceeds from the sale are less than the indebtedness of the defaulting member or firm, such debtor shall remain liable to the Exchange or its members or clearing members for the deficit.

134. [RESERVED]

135. GEM DIVISION

A GEM member who trades electronically or places orders for pit- or electronically-traded products in which they do not have membership privileges is not entitled to member rates for such trades. The time during which a GEM membership is held will not be counted toward satisfaction of the holding period necessary to permit lessees to become order fillers unless the holder can demonstrate that they were primarily engaged in active trading or order filling in GEM Division products during that holding period.

136.-194. [RESERVED]

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195. MARKET MAKER AND INCENTIVE PROGRAMS

The Exchange may approve the implementation of market maker or incentive programs (each individually a "Program" or collectively, "Programs") from time to time or modifications to existing Programs. The terms and conditions of each individual Program will be set forth in separate regulatory filings submitted to the Commodity Futures Trading Commission ("CFTC" or "Commission"). This Rule 195 contains terms and conditions that are generally applicable to the Exchange's administration of the Programs.

Any person, entity, or firm that is accepted as a participant in any of the Exchange's Programs shall be subject to Exchange Rules as one of the Program terms and conditions (each such person, entity, or firm a "Participant").

195.A. Restriction on Non-Public Knowledge

With the exception of allowable privately negotiated transactions and orders executed in accordance with Rule 539.C., an individual responsible for performing the duties of a market maker in which the Participant would be required to maintain two-sided markets in products designated by the Exchange, may not accept, hold or in any manner have possession or non-public knowledge of orders for any other person, including knowledge of customer orders, in the same or a related market. All contract months in the product and any related futures or options contracts, in addition to any corresponding mini-sized futures, options contracts, or swaps shall be considered to be the same or a related market for purposes of this Rule.

195.B. Program Terms and Conditions

1. Authority.

The Exchange shall have the sole authority to determine the qualifications, eligibility, product scope, start and end date, requirements, restrictions, obligations, and incentives of each Program ("Program Terms") and whether an applicant or current Participant meets or has met the Program Terms. The Exchange reserves the right in its sole discretion to apply and interpret Program Terms and modify Program Terms. The Exchange has sole discretion to determine whether a Participant is admitted into or continues participation in any Program.

2. Registration, Documentation, Accounts and Information.

The Exchange may require the Participant to provide and/or execute documentation, including but not limited to applications, bid sheets and/or agreements (collectively, "Documents") containing the Program Terms or other participant information prior to admission or continued participation in a Program. Where Documents are required, they must be submitted in accordance with any specified requirements set forth by the Exchange. The implementation or modification of a Program is subject to all applicable regulatory processes and certification with the CFTC, and the completion of such processes and certification are conditions precedent to the effectiveness of any Document.

All information supplied by the Participant concerning the Participant, its principals, and all other information set forth in its Documents must be true, correct and complete. Submission of incomplete, incorrect, or false information may subject the Participant to Exchange disciplinary action. The Participant agrees to notify the Exchange in writing of any material changes with respect to the information that take place after the Participant has submitted its Documents and, if accepted into the Program, for the duration of the Participant's participation in the Program.

The Participant must provide the Exchange with any required information including, without restriction, any account information, and register such accounts with the Exchange in order to be eligible to participate in the Program. Participant accounts must be registered with the Exchange for each Program into which a Participant is admitted. Any Participant that has not provided account information on a timely basis may not be eligible to receive incentives in the Exchange's sole discretion.

The Participant shall promptly notify the Exchange in writing if the Participant: (i) merges with or acquires, in whole or in part, any separate trading entity, or (ii) is acquired, in whole or in part, by any separate entity.

3. Monitoring of Participant Activity.

The Exchange shall have the right to monitor the Participant's activity to ensure compliance with the Program Terms.

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4. Incentives.

The Exchange has the sole and final determination as to any rankings, calculations, accrual, and disbursement of incentives. Apart from the specific fee incentives listed in the Program, in any, all fees associated with transacting on the Exchange will continue to apply at the applicable standard rates.

5. Exchange Right to Terminate Participation.

The Exchange may terminate a Participant's status in a Program in its sole discretion, including but not limited to the following circumstances: (a) the Participant no longer meets the qualifications or eligibility requirements of the Program or has failed to meet any applicable Program obligations; (b) the Participant violates any of the Rules; (c) the Participant takes any action or engages in any omission that, in the Exchange's sole discretion, has an adverse effect on, or damages the reputation of, the Exchange, the Program's products, or any of the Exchange's trading and/or clearing venues; (d) such termination is necessary, in the sole discretion of the Exchange, to comply with any applicable law or regulation, or any other agreement, legal proceeding, investigation or settlement to which the Exchange, or any of its affiliates, is a party or which may affect the Exchange or any of its affiliates; (e) the Exchange is asked or required to terminate or modify the applicable Program by the Commission or its staff, or any other regulatory body or its staff with jurisdiction over such matters; (f) the Participant ceases doing business as a going concern; (g) the Participant files any petition under the Federal Bankruptcy Act or any state insolvency law, becomes insolvent, has an involuntary petition in bankruptcy filed against it or has a receiver appointed for it or its property; (h) the Participant fails to maintain an appropriate clearing arrangement with an Exchange clearing member firm; or (i) the Exchange delists the products under the applicable Program, upon the effective date of such delisting.

6. Delisting of Program Products.

To the extent that additional products included in the applicable Program have not been delisted, the applicable Program shall remain in effect with respect to the remaining listed products unless otherwise terminated by the Exchange.

7. Limitation of Liability.

The Exchange shall not have any liability to Participant or any third party with respect to its administration of a Program, and the exclusive remedy of Participant for any claim under a Program will be termination of the applicable Document for enrolment in a Program and Participant's participation in a Program. The Exchange and its partners, directors, officers, employees, shareholders and agents shall not be liable to Participant, 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 a Program, the Program Terms, and the applicable Document for enrolment in a Program. For the avoidance of doubt, the liability of the Exchange for any event not related to the administration of the Program shall be limited by Rule 578 and any related dispute shall be subject to the arbitration requirements of Rule 578.

195.C. Priority

Nothing in this Rule shall alter or waive a Participant's responsibility to comply with the provisions of the Commodity Exchange Act ("CEA" or "Act") and the rules and regulations duly issued pursuant thereto by the CFTC, including the filing of reports, maintenance of books and records, and permitting inspection and visitation by duly authorized representatives of the CFTC.

195. D. Participant Compliance

If a Participant is accepted into a Program, the Participant must comply with all applicable Program Terms, Exchange Rules, Exchange Fee Policy Bulletins, and Exchange policies located on CME Group Inc.'s website at www.cmegroup.com, including all amendments thereto.

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CHAPTER 2
GOVERNMENT

200.-229. **[RESERVED]**

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232. **EXCHANGE FACILITIES**

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Chapter 2
Government

200.— 229. [RESERVED]

BOARD OF DIRECTORS – POWERS AND DUTIES

230. GENERAL

The Board shall, subject to applicable provisions in the relevant corporate charter and bylaws:

a. Be the governing body of the Exchange;

b. Have charge and control of all property of the Exchange;

c. Provide, acquire and maintain suitable Exchange quarters and facilities;

d. [Reserved];

e. [Reserved];

f. Designate and authorize specific appointed officers to act on behalf of the Board to execute contracts within specified budgetary limits;

g. Fix, determine and levy all membership dues, fees and assessments when necessary;

h. Act in a judicial capacity in the conduct of hearings with respect to any charges proffered against Members as defined in Rule 400 and non-members and, after such hearings, determine what disciplinary action, if any, should be taken by the Exchange with respect to those charges;

i. Determine the commodities traded, the Division in which they shall be traded, the delivery months, hours of trading, the days of the contract month on which delivery may be made, and performance bond requirements;

j. Make and amend the Rules; provided, the Board may also delegate authority to make and amend the Rules as it deems appropriate; and

k. Have power to act in emergencies. In the event that the Board or a hearing panel of the Board determines that an emergency situation exists in which the free and orderly market in a commodity is likely to be disrupted, or the financial integrity of the Exchange is threatened, or the normal functioning of the Exchange has been or is likely to be disrupted, it may, upon a majority vote of the members present or upon a majority vote of the members who respond to a poll, take such action as may in the Board's sole discretion appear necessary to prevent, correct or alleviate the emergency condition. Board members who abstain from voting on a Significant Action as defined in Rule 234 shall not be counted in determining whether such action was approved by a majority vote, but such members can be counted for the purpose of determining whether a quorum exists. Without limiting the foregoing, the Board may: (1) suspend, curtail or terminate trading in any or all contracts, (2) limit trading to liquidation of contracts only, (3) order liquidation or transfer of all or a portion of a member's proprietary and/or customers' accounts, (4) order liquidation of positions of which the holder is unable or unwilling to make or take delivery, (5) confine trading to a specific price range, (6) modify the trading days or hours, (7) alter conditions of delivery, (8) fix the settlement price at which contracts are to be liquidated, and (9) require additional performance bonds to be deposited with the Clearing House. All Exchange contracts shall be subject to the Board's emergency powers and the specifications of each shall be deemed subject to this rule.

   Any authority or discretion by these rules vested in or delegated to any other Person or committee shall not be construed to deprive the Board of such authority or discretion and in the event of a conflict, the determination of the matter by the Board shall prevail.

231. [RESERVED]

232. EXCHANGE FACILITIES

The Exchange shall provide trading facilities which shall be open for trading on such days and at such hours as the Exchange shall determine, except during emergency situations as provided by Exchange rules.

233. [RESERVED]

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234. AVOIDING CONFLICTS OF INTEREST IN "SIGNIFICANT ACTIONS"

234.A. Definitions

For purposes of this rule:

1. "Significant Action" means (a) an Exchange action or rule change which addresses an "emergency" as defined in CFTC Regulation 40.1(h); or (b) any change in Exchange performance bond levels that is designed to respond to extraordinary market conditions such as an actual or attempted corner, squeeze, congestion or undue concentration of positions, or that otherwise is likely to have a substantial effect on prices in any contract traded or cleared at the Exchange.
2. "Committee" means the Board or any body that is authorized to take a Significant Action.
3. "Member's Affiliated Firm" means a firm in which the member is a "principal," as defined in CFTC Regulation 3.1(a), or an employee.

234.B. Review of Position Information

1. Prior to the consideration of any Significant Action, each member of the Committee must disclose to the appropriate Exchange staff the following position information to the extent known to them:
   a. Gross positions held at the Exchange in the member's personal accounts or "controlled accounts," as defined in CFTC Regulation 1.3(j);
   b. Gross positions held at the Exchange in proprietary accounts of the Member's Affiliated Firm;
   c. Gross positions held at the Exchange in accounts in which the member is a principal;
   d. Net positions held at the Exchange in customer accounts at the Member's Affiliated Firm; and
   e. Any other types of positions, at the Exchange or elsewhere, held in the member's personal accounts or the proprietary accounts of the Member's Affiliated Firm that could reasonably be expected to be affected by the Significant Action.
2. Exchange staff will independently determine what positions are held in each of the above categories based on a review of the most recent large trader reports and clearing records available to the Exchange and any other source of information that is held by and reasonably available to the Exchange, taking into consideration the exigency of the Significant Action.
3. The requirements of sections B.1. and B.2. apply only to members who participate in either the deliberations or voting on the Significant Action in question.

234.C. Determination Whether Abstention Required

1. A member of a Committee must abstain from both the deliberations and voting by such Committee on any Significant Action if the member knowingly has a direct and substantial financial interest in the result of the vote based upon either Exchange or non-Exchange positions that could reasonably be expected to be affected by the action or is otherwise conflicted based on existing Exchange policy. Exchange staff will independently require a member of a Committee to abstain from both the deliberations and voting by such Committee on any Significant Action if, based upon the information reviewed in sections B.1. and B.2. above, Exchange staff determines that the member has a direct and substantial financial interest in the result of the vote.
2. The Exchange will prepare written records to document that the conflicts determination procedures required by this rule have been followed. Such records will include (a) the names of all members who attended the meeting in person or who otherwise were present by electronic means; (b) the name of any member who voluntarily recused themselves or was required to abstain from both the deliberations and voting on a matter and the reason for the recusal or abstention, if stated; and (c) information on the position information that was reviewed for each member.

235.—255. [RESERVED]

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EXCHANGE OFFICERS AND EMPLOYEES

256. INDEMNIFICATION OF CERTAIN PERSONS

The Exchange shall indemnify its directors, officers, trustees, Committee members, employees, and other persons as specified in Article VII of the Exchange's Bylaws.

257. EXCHANGE PHYSICAL EMERGENCIES

In the event that the functions of the Exchange are, or are threatened to be, severely and adversely affected by a physical emergency such as fire or other casualty, bomb threats, substantial inclement weather, power failures, communications breakdowns, computer system breakdowns, screen-based trading system breakdowns, malfunctions of plumbing, heating, ventilation, and air conditioning systems or transportation breakdowns, the Chief Executive Officer or Chief Operating Officer or their delegate may take any action necessary to deal with the emergency, including but not limited to, a suspension of trading. In the absence of the aforementioned Exchange officers or delegate, any member of the Executive Committee may act instead of the Chief Executive Officer or Chief Operating Officer.

Upon a determination by the Chief Executive Officer or Chief Operating Officer or their delegate that the physical emergency has sufficiently abated to permit the orderly functioning of the Exchange, they shall order restoration of trading or the removal of other restrictions imposed.

The Exchange shall notify the CFTC of the implementation, modification or termination of a physical emergency action as soon as possible after taking the action.

Nothing in this rule shall in any way limit the authority of the Board of Directors to act in an emergency situation pursuant to Rule 230.k.

258. EXCHANGE PERSONAL TRADING POLICY

(a) Definitions: For purposes of this Rule, the terms "employee," "material information," non-public-information" and "commodity interest" have the meanings ascribed to them in CFTC Regulation 1.59. The term "connected person" has the meaning ascribed to it in the CME Group Personal Trading Policy.

(b) No Board member, committee member, employee or consultant of the Exchange shall (i) trade directly or indirectly in any commodity interest if such Board member, committee member, employee, or consultant has access to any material, non-public information concerning such commodity interest or (ii) disclose for any purpose inconsistent with the performance of such person's official duties any material non-public information obtained in connection with such Board member's, committee member's, employee's or consultant's special access related to the performance of such duties.

(c) No employee or consultant of the Exchange may trade (i) any futures or options on futures, regardless of where they are listed or available for trading; or (ii) any swaps cleared by the Chicago Mercantile Exchange Inc. Clearing House. These prohibitions also apply to connected persons of the foregoing, unless the connected person engages in the trading activity in a professional capacity.

(End Chapter 2)

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CHAPTER 3
EXCHANGE COMMITTEES

300. COMMITTEES

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300.B. Board Level Committees

300.C. Non-Board Level Committees

300.D. Disqualification from Certain Committees and Governing Boards

300.E. Disciplinary Offenses Defined

300.F. Use of Disclosure of Material, Non-Public Information

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Chapter 3
Exchange Committees

300. COMMITTEES

300.A. General Provisions

The Board shall establish from time to time Board level committees as defined in the bylaws and non-Board level committees necessary to conduct the business of the Exchange.

Every committee of the Exchange must have a chairman or co-chairmen. For purposes of these Rules, each co-chairman shall have the powers and duties of a chairman if acting in the capacity of a chairman. The chairman or co-chairmen may either be members of the Board, if required by the Rules or applicable committee charter, Exchange members or employees of member firms, or non-members. The Chairman of the Board may appoint vice-chairmen or alternate chairmen to each committee. All meetings shall be called upon request of the chairman of the committee. In the absence of the chairman or a co-chairman, the function of that office shall be performed by a vice-chairman or an alternate chairman and may be performed by the Chairman of the Board.

Meetings shall be conducted according to established procedures of the Exchange, its bylaws or committee charter, as applicable. In the absence of established procedures, or in the case of a dispute, Robert's Rules of Order may be consulted as a guide. Voting by proxy at committee meetings shall not be permitted.

300.B. Board Level Committees

The duties of Board level committees are to establish plans for the strategic direction of the Exchange, develop regulatory policy, advise and assist the Board and perform the specific duties assigned to them elsewhere in these Rules and/or in their charters. The Board may refer to a committee any matter within the committee's jurisdiction, and it shall be the duty of the committee to meet, consider the matter and make a complete report to the Board.

A quorum of a Board level committee shall consist of a majority of the members of the committee. All members of a Board level committee shall be entitled to vote.

300.C. Non-Board Level Committees

The duties of non-Board level committees are to review investigation reports prepared by Exchange staff, conduct hearings and/or advise and assist the Board and perform the specific duties assigned to them elsewhere in these Rules, in their charters or by the Board. The Board may refer to a committee any matter within the committee's jurisdiction and it shall be the duty of the committee to meet, consider the matter and make a complete report to the Board.

The Chairman may appoint Exchange members or employees of member firms and non-members to all non-Board level committees to serve during the Chairman's term of office and until new committees are appointed. The Chairman may at any time remove any member of a committee, with or without cause, and all vacancies shall be filled as in the case of an original appointment.[1]

Unless otherwise provided in the Rules, a quorum of a non-Board level committee shall consist of a majority of the members of a committee or a committee panel, excluding the vice-chairman, if any. The chairman of a non-Board level committee, or another individual acting in the capacity of the chairman, may vote only to make or break a tie vote unless otherwise provided in the Rules.

No more than one member of a single broker association may serve on a panel of an adjudicatory committee.[2]

300.D. Disqualification from Certain Committees and Governing Boards

No person shall serve on the Board of Directors or any Board level committee; the Clearing House Risk Committee; the IRS Risk Committee; the Business Conduct Committee; any Pit Committee; the Floor Conduct Committee or the Arbitration Committee

1) who is found by a final decision or settlement agreement (or absent a finding in the settlement agreement if any acts charged included a disciplinary offense) to have committed a disciplinary offense, as defined in Section E. below; or

2) whose CFTC registration in any capacity has been revoked or suspended; or

3) who is subject to an agreement with the CFTC or any self-regulatory organization not to apply for

[1] Revised December 2008.
[2] Revised December 2008.

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registration or membership; or

4) who is subject to a denial, suspension or disqualification from serving on a disciplinary committee, oversight committee, arbitration panel or governing board of any self-regulatory organization as that term is defined in Section 3(a)(26) of the Securities Exchange Act of 1934; or

5) who has been convicted of any felony listed in Section 8a(2)(D)(ii) through (iv) of the Commodity Exchange Act;

for a period of three years from the date of such final decision or for such a time as the person remains subject to any suspension, expulsion or has failed to pay any portion of a fine imposed for committing a disciplinary offense, whichever is longer.

300.E. Disciplinary Offenses Defined

"Disciplinary offense" is defined as a:

(1) Violation of any Exchange rule or the rules of a self-regulatory organization (as defined in CFTC Regulation 1.63(a)(1)), except those violations that are related to (a) decorum or attire, (b) financial requirements, or (c) reporting or recordkeeping violations which receive cumulative fines of $5,000 or less within any calendar year;

(2) Notwithstanding paragraph (1) above, a “disciplinary offense” shall include a violation of any Exchange rule or rule of another self-regulatory organization which: (a) involves fraud, deceit or conversion; or (b) results in an access denial, suspension or expulsion;

(3) Violation of the Commodity Exchange Act or CFTC regulations; or

(4) Failure to exercise supervisory responsibility in violation of the Rules of the Exchange, the rules of other self-regulatory organizations, the Commodity Exchange Act or CFTC regulations with respect to activities that involved fraud, deceit or conversion.

A Person who serves on any of the committees listed in Rule 300.D. shall inform the Exchange if they are currently ineligible, and shall immediately inform the Exchange if they later become ineligible, to serve on such committees under the standards set forth above with respect to disciplinary offenses. Violation of this rule shall be an act detrimental to the interest or welfare of the Exchange.

300.F. Use or Disclosure of Material, Non-Public Information

No member of any committee shall use or disclose, for any purpose other than the performance of such person’s official duties as a member of a committee, any material non-public information obtained by such person as a result of such person’s participation on any such committee; provided, however, that if any such person who effects any transactions after having received any such material, non-public information so obtained can show that such transaction was effected in the ordinary course of such person’s business, such person shall not be deemed to have used such information in violation of this rule, unless it can be shown that such person would not have effected such transaction in the absence of such information. For the purposes of this rule, the terms “material” and “non-public information” shall have the meaning set forth in CFTC Regulation 1.59(a).

(End Chapter 3)

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Chapter 4
Enforcement of Rules

400. GENERAL PROVISIONS

The Board has adopted Rules, and from time to time adopts amendments and supplements to such Rules, to promote a free and open market on the Exchange, to maintain appropriate business conduct and to provide protection to the public in its dealings with the Exchange and its Members. The Board has created committees to which it has delegated responsibility for the investigation, hearing and imposition of penalties for violations of Exchange Rules. The Board has also delegated responsibility for the investigation and imposition of penalties for violations of certain Exchange Rules to Exchange staff as set forth in the Rules. The delegation of such responsibility and authority shall in no way limit the authority of the Board with respect to all Rule violations.

For purposes of Chapter 4, the term "Member" shall mean: 1) members and clearing members of the Exchange, including retired members with floor access privileges and individuals and entities described in Rule 106; 2) associated persons ("APs") and affiliates of clearing members and member firms of the Exchange; 3) guaranteed introducing brokers of clearing members and member firms of the Exchange and their APs; 4) Exchange permit holders and any Person or entity that has been granted cross-exchange trading privileges; 5) employees, authorized representatives, contractors, and agents of a Member in regard to the Exchange related activities of such individuals or entities; 6) regular firms; 7) any Person subject to the jurisdiction of the Exchange pursuant to Rule 418; 8) individuals and entities that have agreed in writing or via electronic signature to comply with the Rules of the Exchange; and 9) CBOT members and other individuals who have access to the Trading Floor.

Members are deemed to know, consent to and be bound by all Exchange Rules. Former Members shall be subject to the continuing jurisdiction of the Exchange, including, without limitation, the application of Rule 432.L., with respect to any conduct that occurred while a Member.

For the purpose of Chapter 4, “Respective Department” shall mean each of the Market Regulation Department, the Financial and Regulatory Surveillance Department or the Clearing House and “Investigation” shall mean any inquiry into a potential rule violation including, but not limited to, inquires arising out of routine surveillance, notifications or examinations.

401. THE CHIEF REGULATORY OFFICER

It shall be the duty of the Chief Regulatory Officer to enforce Exchange Rules, and they shall have available to them at all times the resources of the Market Regulation Department, the Financial and Regulatory Surveillance Department and such other Exchange resources and departments as may be necessary to conduct investigations of potential or alleged Rule violations and market conditions. The Chief Regulatory Officer shall have the authority to inspect the books and records of all parties subject to the jurisdiction of the Exchange pursuant to Rule 418 and the authority to require any such party to appear before the Chief Regulatory Officer and produce their or its books and records and answer questions regarding alleged violations of Exchange Rules, at the time, place and in the manner the Chief Regulatory Officer designates. The Chief Regulatory Officer shall be authorized to issue charges at the request of the Respective Department pursuant to the provisions of Rule 406. The Chief Regulatory Officer may also delegate their authority to staff of the Market Regulation Department.

402. BUSINESS CONDUCT COMMITTEE

402.A. Jurisdiction and General Provisions

The Business Conduct Committee (“BCC”) shall have: 1) jurisdiction over any party subject to the jurisdiction of the Exchange, including any Member, with respect to matters relating to business conduct, trading practices, sales practices, trading ethics and market manipulations or other actions that threaten the integrity of the market; (2) jurisdiction over any party subject to the jurisdiction of the Exchange, including Members, with respect to matters relating to the clearing of transactions or products at the Clearing House, the requirements and obligations of membership in the Clearing House or other actions that threaten the integrity of the Exchange or Clearing House; 3) the authority, pursuant to Rule 402.C., to take emergency actions; 4) the authority, pursuant to Rule 413.B., to conduct hearings on

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denials of access pursuant to Rule 413.A., 5) the authority to conduct hearings, proceedings and appeals on all matters over which it has jurisdiction; and 6) the authority to make findings on Rule violations against any party subject to the jurisdiction of the Exchange, including any Member.

With respect to subject matter set forth in clause (1) above, the BCC shall act through a panel ("Panel","BCC Panel", or "Hearing Panel")) comprised of a Hearing Panel Chair, two exchange members or employees of member firms and two non-members. At least one of the exchange members or employees of member firms must be from the designated contract market where the case originated. A quorum of a Panel shall consist of a majority of the panel, but must include at least the Hearing Panel Chair, one exchange member or employee of a member firm from the designated contract market where the case originated and one non-member.

With respect to subject matter set forth in clause (2) above, the BCC shall act through a BCC Panel comprised of at least one Hearing Panel Chair that is not an employee of a clearing member, two employees of clearing member firms and two non-members. A quorum of a BCC Panel shall consist of a majority of the panel, but must include at least the Hearing Panel Chair, one employee of a clearing member firm and one non-member.

The BCC Panel shall consist of panelists who possess the requisite level of industry knowledge and experience and with sufficiently diverse interests so as to ensure fairness in the hearing or proceeding.

No Person shall serve on the BCC unless they have agreed in writing that they will not publish, divulge, or make known in any manner, any facts or information regarding the business of any Person or any other information which may come to their attention in their official capacity as a member of the BCC, except when reporting to the Board or to a committee concerned with such information or to the Legal Department or Market Regulation Department, when requested by the CFTC or other governmental agency or when compelled to testify in any judicial or administrative proceeding.

All information, records, materials and documents provided to the BCC and all deliberations, testimony, information, records, materials and documents related thereto shall be treated as non-public and confidential and shall not be disclosed, except as necessary to further an Exchange investigation or as required by law.

402.B. Sanctions

If the Panel finds that a party, including a Member, has violated a Rule, the Panel may take one or more of the following actions:

1. Order the party to cease and desist from the conduct found to be in violation of these Rules or from conduct which would violate the rules of any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group, or the Commodity Exchange Act;
2. Order a party to liquidate such portion of the open contracts in the party's proprietary or customers' accounts, or both, as the Panel deems appropriate to ensure the integrity of Exchange contracts or to ensure an orderly and liquid market;
3. Order a party or its customer to deposit such additional performance bonds with the Clearing House as the Panel deems appropriate to protect the integrity of open contracts;
4. Prescribe such additional capital or other financial requirements as it deems appropriate;
5. Restrict the ability of the party to have a business affiliation with, be employed by or have a financial or beneficial interest in a Member or broker association;
6. Restrict, suspend or terminate the party's 1) access to the Trading Floor, 2) direct and/or indirect access to any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group, or 3) right to supervise the entry of any orders by others into CFTC-regulated entities owned or controlled by CME Group;
7. Restrict the party's ability to trade, place, enter, accept or solicit orders in any or all products of any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group;
8. Suspend any or all of the Member's privileges of membership as defined in Rule 121;
9. Expel the Member from membership in any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group;
10. Impose a fine upon the party not to exceed $5,000,000 per violation;
11. Order a party to disgorge any monetary benefit resulting from a violation of an Exchange Rule

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whether by that party or another party. For purposes of this provision, benefit includes, without limitation, profit, whether realized or unrealized, and avoided losses;

12. Prescribe limitations on positions of the party as may be appropriate, including issuing an order that no Clearing Member accept new positions on behalf of any such party;
13. Impose advertising restrictions upon the Member pursuant to these Rules;
14. Order a party to make restitution to the account of anyone damaged by the conduct, or to the Clearing Member who has previously made restitution to the account of such party;
15. Order a party or its legal counsel or other representative to pay out of pocket expenses incurred by the exchange in connection with the matter if such party, counsel or representative engaged in vexatious, frivolous or bad faith conduct during the course of an Investigation or enforcement proceeding;
16. Revoke the regularity status of a regular firm;
17. Order such action as is necessary to prevent a threat to the contract or violation of the Commodity Exchange Act or Exchange Rules; and/or
18. With the approval of the Market Regulation Department and the party, order any other sanction or undertaking to address or deter the underlying violative conduct pursuant to a supported offer of settlement.

When determining whether to impose any of the sanctions listed above, the Panel may consider any factors determined by the Panel to be relevant in the context of a particular case, including any of the factors described in the "Sanctioning Guidance to Self-Regulatory Organizations" in the CFTC Policy Statement Relating to the Commission's Authority to Impose Civil Money Penalties and Futures Self-Regulatory Organizations' Authority to Impose Sanctions: Penalty Guidelines (1994).

402.C. Emergency Actions

1. The BCC is authorized to determine whether an emergency exists and whether emergency action is warranted. The following events and/or conditions may constitute emergencies:
   a. Any actual, attempted, or threatened market manipulation;
   b. Any actual, attempted, or threatened corner, squeeze, congestion, or undue concentration of positions;
   c. Any action taken or considered by the United States or any foreign government or any state or local government body, any other contract market, board of trade, or any other exchange or trade association (foreign or domestic), which may have an impact on trading on the Exchange;
   d. The actual or threatened bankruptcy or insolvency of any Member or the imposition of any injunction or other restraint by any government agency, self regulatory organization, court or arbitrator upon a Member which may affect the ability of that Member to perform on its contracts;
   e. Any circumstance in which it appears that a Member or any other Person or entity has failed to perform contracts or is in such financial or operational condition or is conducting business in such a manner that such Person or entity cannot be permitted to continue in business without jeopardizing the safety of customer funds, Members, or the Exchange; and/or
   f. Any other circumstance which may have a severe, adverse effect upon the functioning of the Exchange, except that declarations of Force Majeure and actions taken with respect to such declarations will be governed by the provisions of Rule 701.
2. In the event that the BCC determines, in the good faith exercise of its sole discretion, that an emergency exists, it may take any of the following emergency actions or any other action that may be appropriate to respond to the emergency:
   a. Suspend, curtail or terminate trading in any or all contracts;
   b. Restrict, suspend or terminate a party's 1) access to the Trading Floor, 2) direct and/or indirect access to any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group, or 3) right to supervise the entry of any orders by others into CFTC-regulated entities owned or controlled by CME Group;
   c. Limit trading to liquidation of contracts only;
   d. Impose or modify position limits and/or order liquidation of all or a portion of a party's account;
   e. Order liquidation or transfer of positions as to which the holder is unable or unwilling to make

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or take delivery;

f. Confine trading to a specific price range;

g. Modify price limits;

h. Modify the trading days or hours;

i. Modify conditions of delivery;

j. Establish the settlement price at which contracts are to be liquidated;

k. Require additional performance bond to be deposited with the Clearing House; and/or

l. Order any other action or undertaking to address or relieve the emergency.

3. All actions taken pursuant to subsections 1 and 2 above shall be by a majority vote of the Panel members present. The Market Regulation Department shall give appropriate notice of such action. As soon as practicable, the Board and the CFTC shall be notified of the emergency action in accordance with CFTC regulations. Nothing in this section shall in any way limit the authority of the Board, other committees, or other appropriate officials to act in an emergency situation as defined by these Rules.

403. CLEARING HOUSE RISK COMMITTEE

403.A. Jurisdiction and General Provisions

The Clearing House Risk Committee (or any subcommittee thereof) (collectively, "CHRC"), shall review each new applicant's qualifications for status as a Base Clearing Member and refer each such application for Clearing Membership along with the CHRC's feedback to the Clearing House Oversight Committee for approval. The CHRC shall review any changes to the Clearing Membership requirements and new types of clearing membership and shall approve all substantive changes and recommend them to the Clearing House Oversight Committee for its approval.

In addition to the responsibilities set forth in these Rules, the CHRC shall have the composition, responsibilities and other characteristics as set forth in its Charter.

If the CHRC determines that a Clearing Member is in a financial condition which jeopardizes or may jeopardize the integrity of the Exchange, the CHRC may, by majority vote:

1. Order the Clearing Member or its customers to deposit such additional performance bond with the Clearing House as deemed appropriate to protect the integrity of open contracts;
2. Prescribe such additional capital or other financial requirements as it deems appropriate;
3. Impose position limits on Clearing Members based on their regulatory capital and such other criteria as it deems appropriate;
4. Suspend a Clearing Member, subject to approval of any two of the following individuals: the Chief Executive Officer, the Global Head of Clearing, the Chairman of the Board, the Chairman of the CHRC, or the Chairman of the Clearing House Oversight Committee;
5. Order the Clearing Member to cease and desist from the conduct found to be contrary to the best interests of the Exchange; and/or
6. Any other circumstance which may have a severe, adverse effect upon the functioning of the Exchange, except that declarations of Force Majeure and actions taken with respect to such declarations will be governed by the provisions of Rule 701.

No Person shall serve on the CHRC unless they have agreed in writing that they will not publish, divulge, or make known in any manner, any facts or information regarding the business of any Person or entity or any other information which may come to their attention in their official capacity as a member of the CHRC, except when reporting to the Board or to a committee concerned with such information or to the Legal Department, Financial and Regulatory Surveillance Department or Market Regulation Department, when requested by the CFTC or other governmental agency or when compelled to testify in any judicial or administrative proceeding.

All information and documents provided to the CHRC and all deliberations and documents related thereto shall be treated as non-public and confidential and shall not be disclosed, except as necessary to further an Exchange investigation or as required by law.

403.B. Emergency Actions

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1. The CHRC is authorized to determine whether an emergency exists and whether emergency action is warranted. The following events and/or conditions may constitute emergencies:
   a. Any circumstances which may materially affect the performance of contracts traded on the Exchange, including failure of the payment system;
   b. Any action taken by the United States or any foreign government or any state or local government body, any other contract market, board of trade, or any other exchange or trade association (foreign or domestic), which may have a direct impact on trading on the Exchange;
   c. The actual or threatened bankruptcy or insolvency of any Member or the imposition of any injunction or other restraint by any government agency, court or arbitrator upon a Member of the Exchange which may affect the ability of that Member to perform on its contracts;
   d. Any circumstance in which it appears that a Member or any other Person or entity has failed to perform contracts, is insolvent, or is in such financial or operational condition or is conducting business in such a manner that such Person or entity cannot be permitted to continue in business without jeopardizing the safety of customer funds, Members, and/or the Exchange; and/or
   e. Any other circumstance which may have a severe, adverse effect upon the functioning of the Exchange, except that declarations of Force Majeure and actions taken with respect to such declarations will be governed by the provisions of Rule 701.
2. In the event that the CHRC determines, in the good faith exercise of its sole discretion, that an emergency exists, it may take any of the following emergency actions or any other action that may be appropriate to respond to the emergency:
   a. Order the Clearing Member or its customer to deposit such additional performance bond with the Clearing House as deemed appropriate to protect the integrity of open contracts;
   b. Prescribe such additional capital requirements as it deems appropriate;
   c. Prescribe such position limitations as it deems appropriate;
   d. Order special or advance performance bond or funds to be deposited with the Clearing House from Members or from longs, shorts or both;
   e. Order such performance bond changes as it deems appropriate; and/or
   f. Order any other action or undertaking to address or relieve the emergency.

All actions taken pursuant to this subsection shall be by majority vote of the committee members present. A Member affected by the action taken shall be notified in writing of such action. As soon as practicable, the Board and the CFTC shall be promptly notified of the emergency action in accordance with CFTC regulations. Nothing in this section shall in any way limit the authority of the Board, other committees, or other appropriate officials to act in an emergency situation as defined by these Rules.

404. PIT COMMITTEE

The Pit Committee shall have the authority to: 1) participate in the determination of opening and closing ranges in accordance with Rule 546; 2) oversee and enforce changes in prices in accordance with Rule 528 and the Quotation Change Procedures set forth in the Interpretations & Special Notices Section of Chapter 5; 3) resolve pit space disputes; 4) remove unauthorized Persons from the pit; and 5) resolve, by immediate action, all grievances arising from price infractions pursuant to Rule 514 during pit trading.

A Pit Committee member shall not exercise their authority if they or any Person, firm, or broker association with which they affiliated has a personal, financial, or other direct interest in the matter under consideration. A Pit Committee member shall be deemed to have a financial interest if the decision is likely to have an immediate financial impact on a transaction for their account or an account in which they have an interest or if the decision is likely to impact on liability for filling an order for which they or a Person with whom they have a financial or business relationship was responsible.

405. FLOOR CONDUCT COMMITTEE

The Floor Conduct Committee shall be responsible for resolving pit space disputes that are not resolved by the Pit Committee. The committee shall conduct summary proceedings for alleged violations of Rule 514. Floor Conduct Committee members shall participate in the resolution of quotation change

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requests pursuant to the Quotation Change Procedures set forth in the Interpretations & Special Notices Section of Chapter 5. The Floor Conduct Committee shall have jurisdiction to conduct summary proceedings for violations of, and assess penalties in accordance with, Exchange Rules. The procedures contained in Rule 409 shall govern summary proceedings.

406. ISSUANCE OF CHARGES

The Chief Regulatory Officer shall receive and review investigation reports, including examination and surveillance reports and other notices of non-compliance from each of the Respective Departments when the Respective Department has reasonable cause to believe a violation of an Exchange Rule has occurred warranting disciplinary action.

The Respective Department is not required to provide a respondent notice of its intent to request the Chief Regulatory Officer to issue charges.

No person shall have the right to appear before the Chief Regulatory Officer or make any written submission on their behalf.

The Chief Regulatory Officer shall take one of the following actions:

A. If the Chief Regulatory Officer determines that a reasonable basis exists for finding that a violation of an Exchange Rule may have occurred which warrants disciplinary action, the Chief Regulatory Officer shall issue appropriate charges.

B. If the Chief Regulatory Officer determines that no reasonable basis exists for finding that a violation of an Exchange Rule may have occurred, the Chief Regulatory Officer shall direct that no further action be taken.

C. Direct that the Respective Department investigate the matter further.

The Chief Regulatory Officer shall direct the Market Regulation Department to give notice of the charges to the respondent in accordance with Rule 407.B.

All information, records, materials and documents provided to the Chief Regulatory Officer and all information, records, materials and documents related thereto shall be treated as non-public and confidential and shall not be disclosed, except as necessary to further an Investigation or as required by law.

407. INVESTIGATION, CHARGING MEMORANDUM AND NOTICE OF CHARGES

Each Respective Department shall investigate potential or alleged Rule violations. Investigations, investigation reports, risk-based examination reports and responses, work papers, correspondence and all information and documents obtained during the course of an investigation shall be treated as non-public and confidential and shall not be disclosed by any party, except as necessary to further an Exchange investigation or as required by law. At the request of the Respective Department, the Market Regulation Department is authorized to take recorded interviews pursuant to an Exchange Investigation. Parties and witnesses being interviewed shall have the right to representation, at their own cost, by legal counsel or anyone other than a member of any Exchange disciplinary committee, a member of the Board, an employee of CME Group or a Person related to the investigation. The failure to appear at a scheduled interview or to answer all of the questions posed during that interview may, in the discretion of the BCC Panel Chair, result in the Person being prohibited from testifying in a subsequent hearing on the matter.

Upon conclusion of an investigation, the Respective Department may issue a warning letter to any party as a result of the investigation. Such letter shall not constitute either the finding of a Rule violation or a penalty.

407.A. Investigation File

Each of the Respective Departments shall maintain a file once an investigation is initiated. The file shall include any materials in the possession of the Respective Department that are relevant to the conduct being investigated.

407.B. Notice of Charges; Opportunity for Hearing

Where the Chief Regulatory Officer has issued charges for an alleged Rule violation, the Market Regulation Department shall issue a charging memorandum to the respondent with a brief statement of factual allegations that identifies the charged Rule violation(s). In addition, the Market Regulation Department will send a notice of charges to the respondent. The notice of charges shall set forth the Rule(s) alleged to have been violated, and shall advise the respondent regarding the submission of a

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responsive answer to each charge in accordance with Rule 407.C. Further, the notice of charges shall advise the respondent that the matter will be heard by a BCC Panel and of the time and place for the hearing, if known. The respondent shall also be advised of their right to appear personally at the hearing and of their right to be represented, at their own cost, by legal counsel or a member of the Exchange, other than a member of any exchange disciplinary committee, a member of the Board, an employee of CME Group or a Person related to the investigation.

A respondent may waive their right to a hearing at any time after receipt of the notice of charges. A respondent who elects to waive their right to a hearing on the charges will be notified of the date on which the BCC Panel will render its decision. Upon a finding of guilt on any charge, the BCC Panel will promptly determine what penalties, if any, are to be imposed and their effective date. A respondent who has waived their right to a hearing and/or admitted the charges against them will be advised of their right to participate in the hearing solely with respect to the penalty.

407.C. Answer to Charges

The respondent shall have 21 days after notice to submit a written answer to the charges. The Market Regulation Department and the respondent may agree in writing to an extension of the period of time to submit an answer to such charges. Absent such agreement, upon a showing of good cause, the BCC Hearing Panel Chair may extend the period of time in which the respondent is required to submit their answer. The answer must state that the respondent admits, denies, or lacks sufficient knowledge to admit or deny each charge. A statement of lack of sufficient knowledge shall be deemed a denial.

If a respondent fails to answer the charges in accordance with this Rule, the Market Regulation Department may seek a default finding and sanctions in accordance with Rule 408.F.

407.D. Amendment to Charging Memorandum; Non-Prosecution of Charges

The issuance of charges shall not prevent the Respective Department from continuing to investigate the activity underlying the charges or investigating or examining for other potential violations by the respondent. The Market Regulation Department reserves the right to modify the charging memorandum. Notwithstanding the prior sentence, no charges may be added to the charging memorandum absent the consent of the Chief Regulatory Officer. The Respondent shall have 21 days from notice of an amended charging memorandum to file an answer to any new or modified charges in the amended memorandum.

The Market Regulation Department may, in its sole discretion, decline to prosecute any one or more of the charges previously issued by the Chief Regulatory Officer. If the Market Regulation Department declines to prosecute any previously issued charge after the Respondent has received a Notice of Charges, the Market Regulation Department shall provide notice to the Respondent of such decision. Further the Market Regulation Department may, in its sole discretion, resolve a previously issued charge through issuance of a letter of warning.

408. CONDUCT OF HEARINGS

408.A. General

All disciplinary proceedings conducted before a panel of the BCC or before a hearing panel of the Board of Directors (each a “Panel” or “Hearing Panel”) shall be conducted in accordance with the following procedures.

Hearings shall be fair. The respondent shall have the right to appear personally at the hearing and to be represented at their own cost by legal counsel or anyone other than a member of any exchange disciplinary committee, a member of the Board, an employee of CME Group or a Person related to the investigation. The Panel or the Hearing Panel Chair shall have the power to compel any party subject to its jurisdiction, including any Member, to attend, testify and/or produce evidence in connection with the hearing. The Market Regulation Department shall make reasonable efforts to secure the presence of all other persons called as witnesses whose testimony would be relevant.

408.B. Pre-Hearing

1. Procedural Matters

   Prior to the hearing, but subsequent to the timely filing of an answer, a party charged with a violation of an Exchange rule may examine all evidence in the investigation file that is relevant to the violation(s) charged and all evidence which is to be relied upon by the Market Regulation Department during the hearing. However, the respondent shall not be entitled to examine protected attorney work product, attorney-client communications or investigative work product,

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including, but not limited to, the investigation report, work papers, financial and reporting surveillance records, internal communications and any exception reports. The respondent may obtain a copy of all such evidence, and any copying costs shall be the sole responsibility of the respondent. The Market Regulation Department is not required to produce or obtain any documents that are not in its possession. A respondent who seeks documents that are not in the possession of the Market Regulation Department may request the documents from the custodian of such documents. Upon a showing of good cause, the respondent may petition the Hearing Panel Chair, in writing, for an order compelling the production of documents by a custodian, provided that the custodian is subject to the jurisdiction of the Exchange, the custodian has refused voluntarily to provide the documents and the documents are relevant to the charges. The Market Regulation Department or the custodian may object, in whole or in part, to any such petition.

2. Appointment of a Panel for a Contested Hearing

The Market Regulation Department shall, in writing, notify the respondent of the names of the individuals originally appointed to the Panel for a contested hearing at least 28 days in advance of the originally scheduled hearing date. Within seven days of such notice, parties to the hearing may request the Hearing Panel Chair to strike any panelist for good cause shown. The Hearing Panel Chair may then excuse such panelist and direct that an alternate panelist be appointed. In the sole discretion of the Panel Chair, the hearing may be conducted with less than a full Panel provided a quorum exists.

In the event any panelist is added, the Market Regulation Department shall provide all parties reasonable notice regarding the new panelist. The addition of a new panelist will not delay the scheduled hearing date unless the panelist is added less than five days in advance of the scheduled hearing and a party can demonstrate good cause for the requested delay.

Notwithstanding the foregoing, any party to a contested hearing may, following the filing of an answer to the charges, request the appointment of a Hearing Panel Chair prior to the time period set forth above for the purpose of resolving pre-trial disputes. The matters that may be raised before the Hearing Panel Chair include, without limitation:

a. scope and timing of fact discovery;
b. scope and timing of expert discovery;
c. allocation of discovery costs;
d. use and disclosure of demonstratives;
e. requests to alter timing requirements set forth in these Rules; or
f. scheduling of the contested hearing

The Hearing Panel Chair may hold a pre-trial conference to address these issues or may, in their discretion, resolve them on written submissions by the parties.

The Hearing Panel Chair shall have the authority to issue non-monetary sanctions against any party or legal counsel or other representative who fails to comply with an order of the Chair or who engages in vexatious, frivolous or bad faith conduct. Such sanctions may include drawing adverse inferences or excluding legal argument, evidence or other submissions. Sanctions may not include entry of a default judgment. The Hearing Panel Chair must allow both parties to make written submissions on the issue prior to imposing any sanction.

3. Submission of Documents and Identification of Witnesses

At least 28 days in advance of a contested hearing, the respondent shall submit to the Market Regulation Department, and the Market Regulation Department shall submit to the respondent, copies of all books, documents, records and other tangible evidence, which each plans to rely on or refer to during its direct case at the hearing, and provide a list of the names and titles of witnesses that each plans to call on its direct case at the hearing. The Panel may refuse to consider any books, records, documents or other tangible evidence which was not made available to, or witnesses whose names and titles were not submitted to, the other party pursuant to this section.

To the extent Market Regulation or the respondent intends to call any expert witness at the hearing then such party shall provide to the other, 28 days prior to the date of the hearing, a summary of the expert's opinions to be offered at the hearing and the basis and/or methodology underlying such opinions. In addition, the expert's credentials (e.g., a *curriculum vitae*) and all documents or other materials on which the expert relied in forming their opinions shall be produced to the other party at the same time. For purposes of this provision, staff in the Market Regulation Department

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or other CME Group employee shall not be considered experts. The Panel may decline to consider any expert testimony beyond the scope of the submitted summary.

4. Additional Discovery

   Absent an order of the Hearing Panel Chair or consent of the parties, no discovery beyond that set forth in Rules 407 and 408 shall be permitted.

5. Motions

   The Hearing Panel Chair shall have the authority to decide all procedural and evidentiary matters and all pre-hearing motions, and the Hearing Panel Chair's decision shall be final. Notwithstanding the preceding sentence, no motions to dismiss any or all of the charges or any other dispositive motion may be filed.

   Any pre-hearing motion must be submitted in writing to the parties and BCC's counsel at least 21 days in advance of the scheduled hearing. The opposing party shall submit a response, if any, within seven days of receipt of any pre-hearing motion. No reply papers are permitted. The Hearing Panel Chair, in their sole discretion, may hold oral argument on any motion or may decide any motion on the written submissions of the parties.

408.C. Offers of Settlement

A respondent that is the subject of an Investigation which has been referred to the Market Regulation Department Enforcement Group for prosecution by a Respective Department as provided in this Chapter, may submit for consideration by the Panel a written offer of settlement in disposition of such matter. Such submission may be made at any time prior to the Panel commencing deliberations at a contested hearing of the case. No offer of settlement may be submitted by a respondent to the Panel unless the Market Regulation Department supports the offer.

A respondent may submit an offer of settlement without admitting or denying the Rule violations or factual findings upon which the penalty is based; provided, however, that an offer must include a consent to entry of findings by the Panel regarding the conduct and Rule violations at issue, to the penalty to be imposed and to the effective date of the penalty.

The respondent's written offer of settlement and the Market Regulation Department's supporting statement shall be submitted to the Panel for consideration.

The Market Regulation Department shall, in writing, notify the respondent of the names of the individuals originally appointed to the Panel to consider respondent's settlement offer at least seven days in advance of the originally scheduled hearing date. Parties to the hearing may request the Hearing Panel Chair to strike any panelist for good cause shown. The Hearing Panel Chair may then excuse such panelist and direct that an alternate panelist be appointed. In the sole discretion of the Panel Chair, the hearing may be conducted with less than a full Panel provided a quorum exists.

In the event any panelist is added, the Market Regulation Department shall provide all parties reasonable notice regarding the new panelist. The addition of a new panelist will not delay the scheduled hearing date unless the panelist is added less than five days in advance of the scheduled hearing and a party can demonstrate good cause for the requested delay.

A respondent may withdraw an offer of settlement at any time prior to the start of the hearing on the proposed settlement before the Panel. If the Panel accepts the offer, a written decision setting forth the Panel's findings and sanction shall be issued, and written notice of the decision shall be given to the respondent. If the offer of settlement is accepted, the BCC's decision shall be final on the date it is signed by the Hearing Panel Chair and, unless otherwise ordered by the Panel, it shall become effective two business days after it becomes final.

If the Panel rejects an offer of settlement, the respondent will be notified of the rejection and it will be deemed withdrawn. If an offer is withdrawn or rejected by the Panel, the respondent shall not be deemed to have made any admissions by reason of the offer and shall not otherwise be prejudiced by having submitted the offer. No statements made or documents exchanged by the parties solely in the context of a withdrawn or rejected offer of settlement or during any settlement negotiations shall be admissible in any contested hearing.

Any subsequent offers of settlement shall be heard by the same Panel; however, alternate panelists may be appointed in the event of scheduling conflicts. Any contested hearing following an offer of settlement not accepted by the Panel will be heard by a new Panel.

In submitting an offer of settlement, the respondent waives their right to a contested hearing and to appeal the Panel's decision if the offer is accepted; the respondent also waives any claim of bias or prejudgment on the part of the Panel.

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408.D. Contested Hearings

The Market Regulation Department shall be a party to the contested hearing and shall present evidence in support of the charged Rule violation(s). The Market Regulation Department and the members of the Panel may question any witness and examine all the evidence stipulated to or presented at the hearing. The respondent shall be entitled to appear personally, testify, produce evidence, call witnesses on their behalf and cross-examine any witness. The Hearing Panel Chair may exclude any witness, other than a party or other essential Person, during the opening statements or during the testimony of any other witness.

The Market Regulation Department bears the burden of establishing the basis for a finding of guilt on any charge by a preponderance of the evidence. Formal rules of evidence shall not apply. The parties may offer such evidence as is relevant to the charges at issue. The Hearing Panel Chair shall determine the admissibility of evidence offered and may exclude evidence that they deem irrelevant or cumulative. The Hearing Panel Chair has the discretion to vary the structure and presentation of evidence to make the hearing as efficient as possible. The parties may submit stipulated facts in order to make the hearing more efficient.

The hearing may proceed in the absence of a respondent who, after due notice, fails to appear. However, the failure to appear is not a default if the respondent has filed a written answer denying the charges issued. Accordingly, Market Regulation still bears the burden of proof and must present evidence to meet that burden.

All testimony and documents produced in connection with a disciplinary hearing shall be deemed non-public and confidential and shall not be disclosed except in connection with proceedings resulting from that hearing or as required by law. A recording or other substantially verbatim record of the hearing shall be made by Market Regulation or a court reporter hired by Market Regulation and become part of the record of the proceeding. If a respondent requests a transcript, the respondent shall be solely responsible for the cost of producing the transcript. No other means of recording the proceedings will be permitted absent written agreement of the parties or pursuant to an order of the Hearing Panel Chair.

A majority vote of the Panel is required for a finding of guilt. A respondent that is found not guilty shall not again be charged with or tried for the same underlying conduct. In the event of a finding of guilt, the Panel, in a separate sanctioning phase, must allow both parties to present arguments and information regarding the appropriate nature and amount of a sanction prior to determining such sanction. In the absence of exceptional circumstances, as determined by the Hearing Panel Chair, the sanctioning phase shall proceed immediately upon the conclusion of the evidence and determination of the committee.

The BCC's decision shall be final on the date it is signed by the Hearing Panel Chair. The BCC's decision shall become the final decision of the Exchange after the appeal period has lapsed.

408.E. Decisions

Promptly following a hearing, BCC Panel shall issue to the Market Regulation Department and to respondent a written decision of the Panel's findings, which shall include: the notice of charges (or a summary thereof); the answer to the charges, if any (or a summary thereof); a brief summary of the evidence produced at the hearing; a statement of findings and reasoned conclusions with respect to each charge, including the specific Rules which the respondent is found to have violated; a declaration of any penalty imposed and the effective date of such penalty; and the availability, if any, of an appeal of the decision within the Exchange or to the Commodity Futures Trading Commission.

408.F. Default Proceedings

If a respondent fails to submit a written answer to the charges pursuant to Rule 407.C., or answers but fails to deny the charges, Market Regulation may serve the respondent with a motion for default and a request for sanctions. The motion for default shall request that a BCC Panel Chair find that the respondent is deemed to have admitted the charges, and the request for sanctions shall request that a BCC Panel impose sanctions on the admitted charges. A copy of the motion for default and request for sanctions shall also be filed with the CME Group Legal Department, which serves as counsel to the BCC Panel.

The Respondent shall have 21 days from notice to respond to the motion for default and request for sanctions. Thereafter, the respondent will be provided at least seven days' notice of the date of a hearing to consider the motion for default and request for sanctions. The respondent shall have the right to be represented at the hearing at their own cost by legal counsel or anyone other than a member of a disciplinary committee, a member of the Board, an employee of CME Group or a Person related to the Investigation.

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At the hearing, based on the written filings of the parties, except where the BCC Panel Chair determines that oral argument is necessary, the BCC Panel Chair will first decide if the respondent has failed to answer the charges in accordance with Rule 407.C., and, if so, the respondent shall be deemed to have admitted the charges. If the BCC Panel Chair finds that the respondent has admitted the charges, the respondent will be deemed to have waived their right to a hearing on the merits of the charges, the BCC Panel shall find that the violations alleged in the charging memorandum have been committed, and the BCC Panel will then determine the sanctions, if any, to be imposed, after permitting both parties to present arguments and information regarding the appropriate nature and amount of any such sanctions.

If an answer contains both an admission to one or more charges and a denial of one or more charges, the BCC Panel will consider the penalties which may be imposed for the admitted charges at the same time that the charges denied by the respondent are considered.

If the BCC Panel Chair does not find that the respondent has failed to answer the charges, no further action on the charges will occur at the hearing.

Decisions on the Motion for Default and the sanctions imposed shall be issued in accordance with Rule 408.E.

409. SUMMARY PROCEEDINGS BEFORE THE FLOOR CONDUCT COMMITTEE

409.A. Jurisdiction

A member of the Floor Conduct Committee or a designated representative of the Market Regulation Department shall have the authority to issue charges against an individual with respect to trading infractions as set forth in Rule 514. A panel of the Floor Conduct Committee shall have authority to conduct summary proceedings with respect to charges under Rule 514.

Charges against an individual shall be issued by filing the appropriate forms with the Market Regulation Department. The Market Regulation Department will then serve the respondent with a copy of the charges.

409.B. Selection of the Panel

For proceedings before the Floor Conduct Committee, the Chief Regulatory Officer or their designee, in consultation with a Floor Conduct Committee Co-Chairman, shall select a panel consisting of three additional members of the Floor Conduct Committee, which may include other Co-Chairmen of the committee. The Chief Regulatory Officer shall endeavor to rotate the members serving on the panels.

No panelist may serve on the particular panel if they or any Person, firm, or broker association with which they are affiliated has a personal, financial, or other direct interest in the matter under consideration.

409.C. Conduct of Summary Proceedings

A summary proceeding before the Floor Conduct Committee shall be conducted in a fair and impartial manner.

A summary proceeding before the Floor Conduct Committee shall take place as soon as practicable after the issuance of charges. The proceeding will not be recorded. The respondent shall be entitled to appear personally and answer the charges issued. Respondents and witnesses may not be represented by counsel at a summary proceeding. However, an employee without membership privileges who is a respondent may be represented by a single representative of their employer. A panel shall decide by a majority vote whether the individual is guilty of the violation or offense charged. If the accused individual is found guilty, a panel may impose fines in accordance with Exchange Rules. A witness who fails to appear at a summary proceeding after being directed to do so by the Chairman of the panel or by staff may be charged with a violation of Rule 432.

If a panel of the Floor Conduct Committee, by a majority vote, decides that the matter is of major importance or might warrant a penalty in excess of its own authority, the Chairman of the Panel shall refer the matter to the Chief Regulatory Officer and shall inform the individual of this referral in writing.

409.D. Appeals

An individual found guilty of an offense who receives a fine greater than $5,000 may, within 10 days of the decision, file a written appeal of the decision with the Market Regulation Department. A written appeal that fails to specify the grounds for the appeal and the specific error or impropriety of the original decision shall be dismissed by the Chief Regulatory Officer. The Hearing Panel Chair may also allow the parties to file briefs in support of or in opposition to an appeal. The appeal shall be heard by a Panel of the BCC ("BCC Panel") whose decision shall be the final decision of the Exchange and not subject to appeal pursuant to Rule 411. The appellant shall be entitled to be represented by counsel,

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appear personally before the BCC Panel and present evidence that they may have in support of their appeal. The BCC Panel shall not set aside, modify or amend the appealed decision unless it determines, by majority vote, that the decision was:

1. Arbitrary, capricious, or an abuse of the committee's discretion;
2. In excess of the committee's authority or jurisdiction; or
3. Based on a clearly erroneous application or interpretation of Exchange Rules.

410. [RESERVED]

411. APPEAL TO A HEARING PANEL OF THE BOARD OF DIRECTORS

The Market Regulation Department may appeal to a hearing panel of the Board ("Appellate Panel") regarding a final decision of or sanction imposed by the BCC by filing a written notice of appeal with the Exchange Legal Department within 10 business days after receiving notice of such decision or sanction. A copy of such notice of appeal shall be provided to the Respondent at the time it is filed with the Legal Department. Filing of a notice of appeal by the Market Regulation Department shall stay any decision that is appealed unless the Chairman of the Board or the BCC Hearing Panel Chair from which the appeal is taken specifically directs that the decision is not stayed pending appeal.

A Member found guilty of an offense or otherwise aggrieved by a final decision of the BCC, may appeal to an Appellate Panel provided that the decision assesses a monetary sanction (including a fine, disgorgement or restitution) greater than $25,000 and/or an access denial or suspension of any membership privileges for greater than ten business days against the Member. The notice shall be filed in writing with the Exchange's Legal Department within 10 business days after Notice of any such decision. A copy of such notice shall be provided to the Market Regulation Department at the time it is filed with the Legal Department. Filing of a notice of appeal by a Member shall stay the decision appealed unless the Market Regulation Department objects to such a stay and the Chairman of the Board or the BCC Hearing Panel Chair from which the appeal is taken specifically directs that the decision is not stayed pending appeal.

A notice of appeal must specify the grounds for the appeal and the specific error(s) or impropriety of the original decision. Upon receiving the notice of appeal the parties, in conjunction with the Exchange Legal Department shall determine a briefing schedule for the appeal. If agreement on the schedule cannot be reached the Appellate Panel Chair shall set the schedule. The Appellate Panel Chair shall determine, in their sole discretion, whether to hold oral argument on the appeal or whether to decide the appeal on the papers submitted by the parties.

The appellate hearing shall be limited to the record from the appealed proceeding. The Appellate Panel shall not entertain any new evidence or new legal theory not raised in the prior proceeding except upon a clear showing by the appellant that such new evidence or new legal theory did not exist or was not ascertainable by due diligence at the time of the proceeding, and that there was insufficient time within the intervening period prior to the hearing of the Appellate Panel for the appellant to bring such new evidence or legal theory to the attention of the BCC.

No member of the Board may serve on a particular Appellate Panel if they participated on the BCC Panel that issued the decision, or if they have a personal, financial, or other direct interest in the matter under consideration or is a member of the same broker association as the respondent or potential respondent.

The Chairman of the Board shall appoint a director to serve as the Appellate Panel chairman, who shall conduct the hearing, and two additional directors to serve on the Appellate Panel. One of these directors shall be a non-member. Any party to the appeal may request the Chairman of the Board to strike any director for good cause shown. The Chairman of the Board may then excuse such director and shall then select an alternate director from the Board. An Appellate Panel shall consist of directors that possess sufficiently diverse interests so as to ensure fairness.

The Appellate Panel shall not set aside, modify or amend the appealed decision unless it determines, by a majority vote that the decision was:

A. Arbitrary, capricious, or an abuse of the committee's discretion;
B. In excess of the committee's authority or jurisdiction; or
C. Based on a clearly erroneous application or interpretation of Exchange Rules.

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In the case of an appeal of a disciplinary decision, the Appellate Panel shall promptly issue a written decision which shall include a statement of findings with respect to the decision from which the appeal was taken and the Appellate Panel's determination that such initial decision is affirmed, set aside, modified or amended in whole or in part and, with respect to any initial decision that is not affirmed in whole, the Appellate Panel's determination of the order or penalty to be imposed, if any. The decision of the Appellate Panel shall be deemed a decision of the Board and shall be a final decision of the Exchange. If a disciplinary sanction results from the decision of the Appellate Panel, the party against whom such sanction was imposed shall be notified of its potential ability to appeal to the Commodity Futures Trading Commission.

This Rule shall not apply to appeals of Arbitration Committee decisions, which shall be governed by the Rules contained in Chapter 6.

412. SUMMARY ACTIONS

In cases of action taken against a Member pursuant to Rules 975, 976, 977 or 8G975, the Member affected shall be notified in writing of such action. The notice shall state: the action taken; the reason for the action; and the effective time, date and duration thereof.

The Member may, within two business days following receipt of notice of action taken, request a hearing before a hearing panel of the Board ("Panel"). The hearing shall be conducted within 60 days of such request, in accordance with the requirements of Rule 408, unless the Hearing Panel Chair determines that good cause for an extension has been shown, but shall not stay any action taken pursuant to Rules 975, 976 977 or 8G975.

Following the hearing, if any, the Panel shall cause to be prepared a written decision containing: a description of the summary action; the reasons for such action; a description of the evidence produced at the hearing; findings and conclusions; a determination that the summary action should be affirmed, set aside, modified or amended and the reasons therefor; and the effective date and duration, if any, of subsequent or continuing actions. The Panel shall not set aside, modify or amend the summary action taken against a Member unless it determines, by a majority vote, that the summary action taken was:

A. Arbitrary, capricious, or an abuse of discretion; or

B. In excess of the committee's authority or jurisdiction.

413. SUMMARY ACCESS DENIAL ACTIONS

413.A. Authority to Deny Access

The Chief Regulatory Officer or their delegate, upon a good faith determination that there are substantial reasons to believe that such immediate action is necessary to protect the best interests of the Exchange, may order that any party be denied access to any or all CME Group markets or any Member be immediately removed from any trading floor or facility owned or controlled by CME Group.

413.B. Notice

Promptly after an action is taken pursuant to Rule 413.A., the party shall be informed of the action taken, the reasons for the action, and the effective date, time and the duration of the action taken. The party shall be advised of their right to a hearing before a panel of the BCC ("Panel") by filing notice of intent with the Market Regulation Department within 10 business days of receiving notice of the action taken.

413.C. Hearing

Parties shall have the right to representation, at their own cost, by legal counsel or anyone other than a member of any Exchange disciplinary committee, a member of the Board, an employee of CME Group or a Person related to the Investigation. The Panel shall conduct a de novo hearing solely on the issue of the denial of access in accordance with the procedures in Rule 408.A. Filing of a notice of intent pursuant to Rule 413.B. shall not stay the Chief Regulatory Officer's decision to deny access.

413.D. Duration of Access Denial

Any decision to deny access pursuant to Rule 413.A. or Rule 413.C. shall not remain in effect for more than 60 days unless the Chief Regulatory Officer or their delegate, upon further consideration of the circumstances that resulted in a prior access denial action, provides written Notice to the party that their access will be denied for an additional period of time not to exceed 60 days and the Notice comports with the provisions of Rule 413.B. Any subsequent extension of the access denial pursuant

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to this Rule must be mutually agreed to by the party and the Chief Regulatory Officer or their delegate. In the absence of such mutual agreement, the Market Regulation Department may petition the BCC to take emergency action pursuant to Rule 402.C. At any time, a Member may petition the BCC to reconsider an access denial pursuant to this Rule based upon materially changed circumstances.

414. INVESTIGATIONS BY OTHER SELF-REGULATORY ORGANIZATIONS

If a self-regulatory organization that is a party to an information sharing agreement with the Exchange requests assistance in connection with an investigation, the Chief Regulatory Officer may direct a party subject to the jurisdiction of the Exchange pursuant to Rule 418 to submit to an examination by the requesting self-regulatory organization and to produce information pertinent to that investigation. The request for assistance shall describe the investigation, explain why Exchange assistance is necessary and describe the scope of assistance sought. An order directing a party subject to the jurisdiction of the Exchange to submit to an examination shall be issued unless the Chief Regulatory Officer determines that such order would not be in the best interests of the Exchange. An examination pursuant to such order shall be conducted according to Exchange Rules and shall be conducted on Exchange premises under the direction of Exchange staff. At the discretion of the Chief Regulatory Officer, representatives of the requesting self-regulatory organization may observe and participate in the examination. Failure to comply with an order issued under this Rule shall be an offense against the Exchange.

415. INFORMATION-SHARING AGREEMENTS

The Chief Executive Officer or their delegate is authorized to provide information:

A. to an exchange, clearing organization, domestic or foreign regulatory agency or member of the Intermarket Surveillance Group ("ISG") that is a party to an information sharing agreement with the Exchange, in accordance with the terms and conditions of such agreement; or

B. as directed by the Commission pursuant to CFTC Regulation 38.159.

416. CONFLICTS OF INTEREST

416.A. Abstention Requirements

A member of a charging, adjudicating, or appeal committee or panel must abstain from participating in any matter where such member:

1. Is a witness, potential witness, or a party;
2. Is an employer, employee, or co-worker of a witness, potential witness, or a party;
3. Is associated with a witness, potential witness, or a party through a broker association as defined in Exchange Rules;
4. Has any significant personal or business relationship with a witness, potential witness, or a party, not including relationships limited to (a) executing futures, options, or swap transactions opposite each other, or (b) clearing futures, option, or swap transactions through the same clearing member; or
5. Has a familial relationship to a witness, potential witness, or a party.

416.B. Disclosure of Relationship

1. Prior to the consideration of any matter involving a subject, each member of a charging, adjudicating, or appeal committee or panel must disclose to the appropriate Exchange staff whether they have one of the relationships listed in Rule 416.A. above with the subject.
2. In its sole discretion, Exchange staff shall determine whether any member of the committee or panel is required to abstain in any matter.

417. PROHIBITED COMMUNICATIONS

417.A. *Ex Parte* Communications

Unless on notice and opportunity for all parties to participate:

1. No subject or respondent (or any counsel to or representative of a subject or respondent) or the Financial and Regulatory Surveillance Department (or any counsel to or representative of the Financial and Regulatory Surveillance Department) or the Market Regulation Department (or any

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counsel to or representative of the Market Regulation Department) shall knowingly make or cause to be made an ex parte communication relevant to the merits (which shall not include scheduling and procedural matters) of an Investigation or a proceeding to a member of a charging, adjudicatory, or appeal committee or panel with respect to that matter or proceeding.

2. No member of a charging, adjudicating, or appeal committee or panel that is participating in a decision with respect to an Investigation or a proceeding shall knowingly make or cause to be made to a subject or respondent (or any counsel to or representative of a subject or respondent) or the Financial and Regulatory Surveillance Department (or any counsel to or representative of the Financial and Regulatory Surveillance Department) or the Market Regulation Department (or any counsel to or representative of the Market Regulation Department) an ex parte communication relevant to the merits (which shall not include scheduling and procedural matters) of that matter or proceeding.

417.B. Communications with Panelists

No Person shall attempt to influence disciplinary matters pending before a charging, adjudicatory, or appeal committee by discussing, or attempting to discuss, such pending matters with a member of such committee or any member of the Board.

417.C. Disclosure

Any Person who receives, makes or learns of any communication which is prohibited by this Rule shall promptly give notice of such communication and any response thereto to the Market Regulation Department or the Financial and Regulatory Surveillance Department, as applicable, and all parties to the proceeding to which the communication relates. A Person shall not be deemed to have violated this Rule if the Person refuses an attempted communication concerning the merits of an Investigation or proceeding as soon as it becomes apparent that the communication concerns the merits.

418. CONSENT TO EXCHANGE JURISDICTION

Any Person initiating or executing a transaction on or subject to the Rules of the Exchange directly or through an intermediary, and any Person for whose benefit such a transaction has been initiated or executed, expressly consents to the jurisdiction of the Exchange and agrees to be bound by and comply with the Rules of the Exchange in relation to such transactions, including, but not limited to, rules requiring cooperation and participation in investigatory and disciplinary processes. Any futures commission merchant, introducing broker, associated person, or foreign Person performing a similar role that charges a commission or fee in connection with transactions on or subject to the Rules of the Exchange also expressly consents to the Exchange's jurisdiction.

419. CONTRACT MODIFICATION

All deliveries must conform to government regulations in force at the time of delivery, and all options must conform to government regulations in force at the time of exercise. Unless specifically provided otherwise in the applicable product chapter, if any duly authorized U.S. government agency or body with appropriate jurisdiction issues an order, ruling, directive or law that conflicts with the requirements of these Rules, such order, ruling directive or law shall be construed to take precedence and become part of these Rules, and all open and new contracts shall be subject to such government orders.

420. – 431. [RESERVED]

432. GENERAL OFFENSES

It shall be an offense:

A. to have an interest in, operate or knowingly act on behalf of a bucket-shop, or knowingly make any transaction with a bucket-shop;

B. 1. to engage, or attempt to engage, in fraud or bad faith;

2. to engage in conduct or proceedings inconsistent with just and equitable principles of trade;

C. to engage in dishonest conduct;

D. to create or report a false or fictitious trade;

E. to extort or attempt extortion;

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F. to buy or sell any Exchange futures, options contracts, or swaps with the intent to default on such purchase or sale;

G. to prearrange the execution of transactions in Exchange products for the purpose of transferring equity between accounts;

H. to engage in, or attempt to engage in, the manipulation of prices of Exchange futures, options contracts, or swaps; to corner or squeeze, or attempt to corner or squeeze, the underlying cash market; to intentionally or recklessly use or employ, or attempt to use or employ, any manipulative device, scheme, or artifice to defraud; or to purchase or sell, or offer to purchase or sell Exchange futures, options contracts, or swaps, or any underlying commodities or securities, for the purpose of upsetting the equilibrium of the market or creating a condition in which prices do not or will not reflect fair market values;

I. to make a verbal or written material misstatement to the Board, a committee, or Exchange employees;

J. to intentionally or recklessly deliver or cause to be delivered, or attempt to deliver or cause to be delivered, false, misleading or inaccurate information concerning crop or market information or conditions that affect or may affect the price of any Exchange futures, options contract, or swap or spot transaction in the underlying commodity;

K. to trade or accept performance bonds after insolvency;

L. 1. to fail to appear before the Board, Exchange staff or any investigative or hearing committee at a duly convened hearing, scheduled staff interview or in connection with any Investigation;

2. to fail to fully answer all questions or produce all books and records at such hearing or in connection with any investigation, or to make false statements;

3. to fail to produce any books or records requested by duly authorized Exchange staff, in the format and medium specified in the request, within 10 days after such request is made or such shorter period of time as determined by the Market Regulation Department in exigent circumstances;

M. to use or disclose, for any purpose other than the performance of an individual's official duties as a member of any committee or the Board of Directors, any non-public information obtained by reason of participating in any Board of Directors or committee meeting or hearing;

N. to knowingly accept, directly or indirectly, a trade on the Exchange for the account of a non-member employed on the floor of the Exchange;

O. for a Member to permit the use of facilities or membership privileges in a manner that is detrimental to the interest or welfare of the Exchange or results in a violation of Exchange Rules or the Commodity Exchange Act;

P. for a Clearing Member to fail to maintain minimum financial requirements;

Q. to commit an act which is detrimental to the interest or welfare of the Exchange or to engage in any conduct which tends to impair the dignity or good name of the Exchange;

R. to fail to submit to arbitration any dispute which Exchange staff, an arbitration panel or the Board decides should be arbitrated pursuant to Chapter 6; or to fail to comply with a final arbitration award;

S. to fail to comply with an order of the Board, Exchange staff or any hearing committee;

T. to engage in dishonorable or uncommercial conduct;

U. except where a power of attorney or similar document has been executed pursuant to Rule 956, for any party to accept or transmit a customer order which has not been specifically authorized;

V. to be expelled from a U.S. or foreign designated commodities or securities exchange;

W. for any party to fail to diligently supervise its employees and agents in the conduct of their business relating to the Exchange;

X. to aid or abet the commission of any offense against the Exchange or any violation of an Exchange Rule;

Y. to use improperly the trading or clearing platform of any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group or permit the unauthorized use of such platforms; and/or

Z. for a Member to fail to disclose to their qualifying Clearing Member that an involuntary bankruptcy petition has been filed against them or, in the case of a voluntary bankruptcy proceeding, that they

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have filed or has formed a definite intention to file for bankruptcy.

433. STRICT LIABILITY FOR THE ACTS OF AGENTS

Pursuant to Section 2(a)(1)(B) of the Commodity Exchange Act, and notwithstanding Rule 432.W., the act, omission, or failure of any official, agent, or other Person acting for any party within the scope of their employment or office shall be deemed the act, omission or failure of the party, as well as of the official, agent or other Person who committed the act.

434. [RESERVED]

435. EFFECT OF SUSPENSION OR EXPULSION

Unless otherwise determined by the committee with jurisdiction over such matters, a suspended or expelled Member shall not be entitled to any of the privileges of membership during the period of such suspension or expulsion, including, but not limited to, the right to:

A. access any trading floor owned or controlled by CME Group;

B. direct and indirect access to any Designated Contract Market, Derivatives Clearing Organization or Swap Execution Facility owned or controlled by CME Group;

C. obtain member rates; and

D. any applicable cross-exchange trading privileges.

A member who has been expelled may not lease out an owned membership in any exchange owned or controlled by CME Group and must relinquish ownership of such membership(s) within 30 days of the date that the expulsion becomes the final decision of the Exchange.

436. [RESERVED]

437. NOTICE OF DISCIPLINE

Notice, in accordance with Section 8c(a)(2) of the Commodity Exchange Act, shall be made available to an internet accessible computer database at the National Futures Association and to an internet accessible computer database at CME Group and shall be provided to any Member or non-member who is suspended, expelled, disciplined or denied access to the Exchange within 30 days after the decision becomes final. Additionally, a written notice may be posted on the floor of the Exchange for five business days promptly after the disciplinary action becomes effective. The notice shall include the Member's or non-member's name, the Rule(s) violated, the reason for the Exchange's action and the action taken or penalty imposed.

438. [RESERVED]

439. MEMBER'S INDEMNIFICATION LIABILITY

A Member or former Member shall indemnify and hold harmless the Exchange and CME Group Inc., including each of their respective subsidiaries and affiliates (collectively, the indemnified parties) and their officers, directors, employees, and agents, for any and all losses, damages, costs and expenses (including attorneys' fees) incurred by the indemnified parties as a result (directly or indirectly) of such Member's violation or alleged violation of Exchange Rules or state or federal law.

Any charges arising out of this Rule shall be subject to liens as provided in Rule 110(a).

440. CLAIMS BY MEMBERS

A Member who commences a legal action against the Exchange, its directors, officers, employees, or agents, or another Member of the Exchange without first resorting to and exhausting the procedures established by Rule 110 and the mandatory arbitration provisions of Chapter 6 (including appeals to the Board), or any other Rules relating to settlement of disputes arising out of transactions or matters pertaining to the Exchange shall be deemed to have committed an act detrimental to the interest or

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welfare of the Exchange. This Rule shall not abrogate an individual's right to reparations pursuant to Section 14 of the Commodity Exchange Act.

A Member who commences a legal action against the Exchange, its directors, officers, employees, or agents, after they have exhausted all of the procedures established by the Exchange, may be found to have committed an act detrimental to the interest or welfare of the Exchange in the event that at hearing the Board or the BCC determines that the Member's action was not meritorious or warranted.

441. COMMUNICATIONS WITH THE PUBLIC AND PROMOTIONAL MATERIAL

Promotional material and similar information issued by Members shall comply with the requirements of National Futures Association Rule 2-29, as amended.

442. NOTIFICATION OF SIGNIFICANT EVENTS

Each Member shall provide immediate notice to the Market Regulation Department (and each Member that is a Member Firm or a Clearing Member shall also provide immediate notice to the Clearing House), in writing upon becoming aware of any of the following events relating to such Member:

1. any suspension, expulsion, revocation or restriction of such Member's trading privileges or any fine in excess of $25,000, through an adverse determination, voluntary settlement or otherwise, by any court, commodity or securities exchange or related clearing organization, the Securities and Exchange Commission, the Commodity Futures Trading Commission or the securities commission or equivalent authority of any state, territory, the District of Columbia or foreign country, the National Futures Association, the Financial Industry Regulatory Authority, Inc. or any self-regulatory or regulatory organization;
2. any indictment of the Member or any of its officers for, any conviction of the Member or any of its officers of, or any confession of guilt or plea of guilty or nolo contendere by the Member or any of its officers to 1) any felony or 2) any misdemeanor involving, arising from, or related to the purchase or sale of any commodity, security, futures contract, option or other financial instrument or involving or arising from fraud or moral turpitude; and/or
3. any filing of a bankruptcy petition or insolvency, receivership or equivalent proceeding of which the Member is a subject. In the case of a voluntary bankruptcy, insolvency, receivership or equivalent proceeding, the Member also shall notify the Market Regulation Department, (and the Clearing House in the case of a Member that is a Member Firm or Clearing Member) when such Member forms a definite intention to file such proceeding.

Nothing in this Rule shall limit or negate any other reporting obligations that any member may have to the Exchange or any other regulator or Person.

443. [RESERVED]

444. PAYMENTS OF DISCIPLINARY FINES, DISGORGEMENT ORDERS AND RESTITUTION

Disciplinary fines, disgorgement, and restitution amounts levied pursuant to Exchange rules must be submitted to the Market Regulation Department no later than the date specified in the notice of decision. An individual or entity who fails to provide proof of payment within the time prescribed shall not be entitled to direct or indirect access to any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group until the payment has been received. Any party that fails to make the required payment shall immediately forfeit eligibility for any Exchange incentive or rebate program until the amount is paid in full. Any party that fails to pay a disciplinary fine, disgorgement order, or restitution amount within the prescribed time period may also be subject to sanctions pursuant to Rule 432.S.

Parties may, subject to a determination by the sanctioning entity, be liable for unpaid fines or unpaid disgorgement orders and restitution amounts imposed upon their employees.

(End Chapter 4)

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CHAPTER 5
TRADING QUALIFICATIONS AND PRACTICES

500. SCOPE OF CHAPTER

FLOOR PRIVILEGES

501. EMPLOYEES OF MEMBERS
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503. RETIRED MEMBERS
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505. BOOTH AND FLOOR PRIVILEGES
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- 506.A. Access and Supervision
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Chapter 5
Trading Qualifications and Practices

500. SCOPE OF CHAPTER

This chapter prescribes rules concerning floor access privileges, qualifications for trading privileges, and trading practices.

FLOOR PRIVILEGES

501. EMPLOYEES OF MEMBERS

Members shall register with the Exchange all persons whom they wish to employ on the trading floor. Such employees may act as runners, communicators, clerks and broker assistants. Such employees shall not be permitted to solicit customers or benefit from the production of orders. Such employees shall not trade or have any interest in an account trading in any CME futures, options, or swaps contracts. Employees must wear a prescribed identification badge. Any member permitting trading by such employee shall be guilty of an offense against the Exchange. Remuneration to such employees shall be limited to salaries and normal bonuses. The member employer shall, upon request, provide a report to Exchange staff with respect to each such employee, setting forth the hours of employment, salary and bonus, and a copy of each employee's Internal Revenue Service W-2 Form or other documentation evidencing employment.

The following shall apply to any IMM, IOM or GEM member who also holds a broker assistant badge. Such person shall not trade for, or carry in their account or an account in which they have any interest, any positions in contracts traded on the Exchange except for those contracts which they are entitled to trade as principal or broker for others by virtue of their membership status as referenced above.

A member holding a broker assistant badge shall be required to notify their qualifying clearing member, as defined in Rule 903, of the name, address and immediate supervisor of the member or member firm by whom they are employed as a broker assistant. Upon a qualifying clearing member's revocation of trading authorization in accordance with Rule 903.E., the qualifying clearing member immediately shall give written notice to the member or member firm which employs a member as a broker assistant that the member's trading authorization has been revoked. A member holding a broker assistant badge shall be denied floor access privileges upon the revocation of trading authorization by their qualifying clearing member. The floor access privileges of a member who holds a broker assistant badge may be reinstated upon the filing of a release with the Shareholder Relations and Membership Services Department by the member's qualifying clearing member in accordance with Rule 903.D.

Members shall be responsible for ensuring that their employees comply with all Exchange rules and may, subject to a determination by an Exchange disciplinary committee, be liable for any fines imposed upon such employees by the Exchange. The Exchange may, in its sole discretion, notify a member of the existence of an Exchange investigation and the conduct which is the subject of the investigation involving one of the member's employees when the Market Regulation Department interviews such employee or, if no such interview occurs, when charges are issued against the employee by the Chief Regulatory Officer.

No person shall be registered as an employee pursuant to this rule if such person is determined by Exchange staff not to be of good moral character or if it is determined that such registration may be detrimental to the interest or welfare of the Exchange.

502. ADMISSION TO FLOOR

In addition to authorized employees and agents of the Exchange, only members, registered employees of members, permit holders and authorized visitors shall be permitted on the floor of the Exchange. No person may be introduced on the floor of the Exchange by a member on more than three days of any calendar month. Members must at all times accompany visitors for whom they have obtained floor access and are responsible for the conduct and actions of visitors for whom they have obtained floor access while such visitors are on Exchange premises. No privileges other than admittance to the floor may be extended to a guest. A guest is specifically prohibited from performing any of the functions of an employee of a member or member firm, entering a trading pit, placing orders, using any electronic devices or market display equipment and blocking aisleways or access

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to trading pits.

503. RETIRED MEMBERS

Any member who has been a member for at least 25 years who sells or leases their membership may apply for a retired member badge which will entitle the retired member to access the trading floor. A retired member who leases their membership to another person may place orders for their own account from on the trading floor pursuant to the customer order entry requirements set forth in Rule 536.A.1. A retired member who sells their membership is prohibited from placing orders for any account while on the trading floor. Retired members are prohibited from accessing the trading pits during trading hours.

504. [RESERVED]

505. BOOTH AND FLOOR PRIVILEGES

Booth space on the trading floor may be assigned only to clearing member firms. Available booth space will be assigned by Exchange staff in accordance with the policies established by the Exchange and the decisions of Exchange staff regarding the assignment of booth space shall be final. Clearing member firms may allocate assigned booth space to 1) members qualified by the clearing member firm or 2) member firms with which it has a clearing relationship with respect to exchange products.

Orders may be accepted at or relayed from the booth space assigned to a clearing member firm or allocated to a member or member firm by the clearing member firm only by employees of the member, member firm or clearing member firm and members qualified by the clearing member firm.

Notwithstanding any other rule, any member who is associated as a partner, shareholder, member, officer, manager, employee, or consultant with any entity or natural person that is or should be registered as an Introducing Broker ("IB"), Futures Commission Merchant ("FCM"), Commodity Trading Advisor ("CTA") or Commodity Pool Operator ("CPO") as those terms are defined in Section 1a of the Commodity Exchange Act and/or 17 C.F.R. 1.3, may not solicit orders of others from the floor of the Exchange unless the entity or natural person for which or for whom the member is soliciting orders is also a member firm or member of the Exchange. Additionally, IBs, FCMs, CTAs and CPOs may not operate from booth spaces on the trading floor unless they are member firms or wholly owned by members or member firms.

506. HEADSET PRIVILEGES ON THE TRADING FLOOR

506.A. Access and Supervision

Members and member firms are eligible to use headsets on the trading floor unless such usage is restricted in a particular pit by Exchange policy. Where headset usage is permitted, members and member firms may authorize their nonmember employees to utilize headsets subject to their supervision. For the purposes of this rule, a telephone in, or on the perimeter of, a trading pit shall be treated in the same manner as a headset.

Members and member firms are eligible to lease headsets from the Exchange by filing an application with the Telecommunications Department. Alternatively, members and member firms may use headsets obtained from a third-party provided the Exchange authorizes use of the third-party headsets pursuant to the provisions of Rule 507.A. Members and member firms using headsets provided by a third-party must permit the third-party to provide the Market Regulation Department direct access to recordings required to be made pursuant to the provisions of Rule 536.G.

Members and member firms are responsible for ensuring that their nonmember employees who utilize headsets comply with all requirements set forth in this rule and are responsible for the content of their nonmember employees' headset communications.

506.B. Use of Headsets

Nonmember employees wearing a headset may communicate order and fill information, as well as market information that has been publicly exposed to the trading pit; however, such nonmember employees may not communicate their personal opinions concerning the market or trading activity.

Headsets may be used to communicate between locations on the trading floor, and between the trading floor and off-floor locations. Headsets may be used to accept, place or relay orders provided that all applicable Exchange audit trail and recordkeeping requirements are met, unless such usage is restricted in a particular pit by Exchange policy. However, nonmember customers may not place orders directly to the pit, and floor brokers and their employees may not accept such orders, unless

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the customer's clearing firm, in its sole discretion, has specifically authorized the customer to place orders directly.

507. ELECTRONIC DEVICES

507.A. General Provisions

The use of any electronic device on the trading floor is prohibited unless such device and/or usage has been permitted by the Exchange. For purposes of this rule, the term "electronic device" shall mean any type of voice or data communications interface, including but not limited to a computer, headset, hand-held device, microphone or telephone. No Member (as defined in Rule 400) shall permit others to use any electronic device unless such use has been permitted by the Exchange. Members using a permitted electronic device on the trading floor for permissible business purposes must retain any required audit trail data in accordance with applicable Exchange rules and CFTC regulations.

507.B. Terms and Conditions of Use

The Exchange may, in its sole discretion, impose restrictions on the use of any permitted electronic device by any Member. The Exchange may limit, suspend or terminate any Member's right to use any permitted electronic device at any time, without prior notice and without any liability to the Exchange.

The Exchange shall have the right, at any time, to audit the use of any permitted electronic device by any Member.

The Exchange accepts no responsibility for loss, theft or damage to any equipment permitted for use by a Member on Exchange premises.

Electronic devices that are not issued by the Exchange must not interfere with any Exchange system.

507.C. Electronic Surveillance

The Exchange may intercept and record any electronic communication received or sent from the trading floor to ensure compliance with Exchange Rules. Exchange members, their employees, and all others who are granted access to the trading floor consent, as a condition of their membership, employment, or access to the floor, to the interception, recording, and use of any such communication.

507.D. Personal Electronic Devices

Unless permitted pursuant to Section A. above, personal electronic devices including, but not limited to, cell phones, personal digital assistants (PDAs) and other devices with email, instant messaging or other similar capabilities may be used on the trading floor only for non-business purposes.

507.E. Cameras and Video Equipment

Unless expressly permissioned by the Exchange, the use of any type of camera or video equipment on the trading floor is prohibited.

508. GIVING AND RECEIVING OF GRATUITIES

A member, member firm, broker association or an employee of any of the foregoing may not give, directly or indirectly, to any employee of another member, member firm or broker association any gratuities or gifts with an aggregate market value in excess of $100 within any twelve-month period.

This rule applies notwithstanding any internal policy of an entity that allows for gifts in excess of $100. The requirements of this rule apply to both the providers and the recipients of such gifts and gratuities.

509. ACCOUNTS OF MEMBERS AND MEMBER FIRMS

All trades initiated for the account of a member or member firm, or an account in which the member or member firm has a proprietary interest, shall be disclosed on the books of a clearing member.

TRADING QUALIFICATIONS AND REGULATIONS

510. REQUIREMENTS FOR MEMBERS AND THEIR EMPLOYEES ON THE TRADING FLOOR

All members and their employees on the trading floor shall satisfy all orientation requirements of the Exchange. All members seeking to act as a Floor Broker, Floor Trader, or in any other capacity

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requiring registration pursuant to the Commodity Exchange Act, must be registered in accordance with applicable CFTC regulations.

A member shall be prohibited from engaging in activities requiring registration under the Commodity Exchange Act or from representing themselves to be a registrant under the Commodity Exchange Act or the representative or agent of any registrant if such member's Floor Broker or Floor Trader registration is suspended by the CFTC or if the Exchange has suspended such member's privilege to act as a Floor Broker or Floor Trader on the Exchange.

All members registered with the CFTC must report any changes to such status in accordance with applicable CFTC regulations and must promptly notify the Shareholder Relations and Membership Services Department of any such changes.

511. QUALIFIED TRADERS AND BROKERS

No member shall be permitted to execute a pit, spot call or allowable privately negotiated transaction on the Exchange unless they are qualified to do so by a clearing member.

A member shall place all trades for their own account or any account which they control, on the books of their qualifying clearing member unless written authorization to the contrary from said clearing member has been filed with the Shareholder Relations and Membership Services Department. Regardless of such authorization, a member in a deficit position with any clearing member shall place trades only through their qualifying clearing member. Any non-qualifying clearing member that carries a member's account in a deficit position shall promptly notify the clearing member that is qualifying such member.

A member who believes their qualifying clearing member is unreasonably withholding a release necessary to permit the member to be qualified by a different clearing member may request a hearing before a Panel of the Business Conduct Committee ("Panel") pursuant to the applicable provisions of Rule 408. The Panel may, in its sole discretion, remand a dispute concerning the validity of a signed non-compete agreement between the parties to arbitration pursuant to Rule 600.A. Either party may petition the arbitration chairman for expedited handling of the matter pursuant to Rule 613.

The Panel may assess attorneys' fees and the administrative costs of the proceeding against one or both of the parties if it determines that a claim or defense was frivolous or filed in bad faith.

511.A. Floor Trading

A clearing member may, without prior notice, revoke a member's authorization to trade by written revocation filed with the Shareholder Relations and Membership Services Department. Such revocation shall be effective and the member's qualification to trade shall terminate when notice of the disqualification is posted on the Exchange floor. A member shall not appear upon the floor of the Exchange until they have been requalified. A member who has been disqualified shall promptly return their membership badge to the Shareholder Relations and Membership Services Department.

511.B. Globex Trading

Unless otherwise specified by a member's qualifying clearing member, a member suspended from entering orders through Globex shall not be disqualified from pit trading.

In the case of a member who has Globex access guaranteed by a clearing member other than their qualifying clearing member, the qualifying clearing member may terminate the member's ability to place orders through Globex by notifying the clearing member providing the member access to Globex. The clearing member providing the access to Globex will be responsible for ensuring that the member does not place orders through Globex.

512. REPORTING INFRACTIONS

512.A. General

All data, records and other information required by the rules to be reported to the Exchange or the Clearing House, as applicable, must be submitted in an accurate, complete and timely manner.

512.B. Sanctions

1. Except as otherwise provided in Rule 536, the Chief Regulatory Officer or their designee shall have the authority to impose summary fines on parties who have consented to the jurisdiction of the Exchange. Summary fines shall not be less than $1,000 per offense and shall not exceed $5,000 per offense for individuals or $10,000 per offense for firms for the inaccurate, incomplete or untimely submission of data, records or information required to be submitted to the Exchange or the Clearing House.

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2. Individuals and firms shall have 15 days following receipt of the notice of a summary fine to present evidence to the Market Regulation Department that the fine should be rescinded or reduced. Absent the submission of such evidence within the designated time period, the fine shall be deemed final and may not be appealed.

512.C. Hearings and Appeals

If the Chief Regulatory Officer or their designee determines that evidence submitted by an individual or firm pursuant to Section B.2. is insufficient to support the requested rescission or reduction of the fine, the individual or firm may, within 10 days of the decision, file a written appeal with the Market Regulation Department. A written appeal that fails to specify the grounds for the appeal and the specific error or impropriety of the original decision shall be dismissed. The appeal shall be heard by a Panel of the Business Conduct Committee ("BCC Panel") whose decision shall be final. The appellant shall be entitled to be represented by counsel, appear personally before the BCC Panel and present evidence that they may have in support of their appeal. The BCC Panel shall not set aside, modify or amend the appealed decision unless it determines, by a majority vote, that the decision was:

1. Arbitrary, capricious, or an abuse of the Exchange staff's discretion;
2. In excess of the Exchange staff's authority or jurisdiction; or
3. Based on a clearly erroneous application of Exchange rules.

Notwithstanding the provisions of Sections B.1. and B.2. above, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Chief Regulatory Officer for consideration of charges.

513. CONDUCT, APPAREL AND BADGES

513.A. General

Members and their employees are expected to conduct themselves on Exchange premises with dignity and integrity in order to maintain a safe workplace and the efficiency and good name of the Exchange. Members and their employees shall refrain from excessive speed in moving about the trading floors, and shall be respectful of all others on Exchange premises and shall abide by Exchange policy concerning access, conduct, and appearance. Members and their employees, while on the trading floors, shall be professionally attired in accordance with Exchange policy, and shall wear jackets bearing identification badges issued by the Exchange. Members and their employees not professionally attired in accordance with Exchange policy may be barred or removed from the trading floors. Refreshments and smoking are forbidden on the trading floors at all times.

513.B. Sanctions

1. Designated Exchange officials may impose fines on members or their employees for violations of the Exchange policy concerning access, conduct, and appearance. Fines imposed pursuant to Rule 513.B.1. are final and may not be appealed.
2. A fourth violation of the Exchange policy concerning access, conduct, and appearance within a rolling 18-month period will be subject to a $1,000 fine.
3. A fifth or subsequent violation of the Exchange policy concerning access, conduct, and appearance within a rolling 18-month period will be referred to a summary proceeding before a Panel of the Floor Conduct Committee. The Panel may impose a fine not to exceed $5,000 per violation.
4. Notwithstanding any other provision in this Rule, the Chief Regulatory Officer shall have the authority to impose a fine not to exceed $5,000 per offense on members and their employees for egregious violations of Rule 513.A.
5. The Market Regulation Department, at its discretion, may refer any alleged violation of Rule 513 to the Chief Regulatory Officer for consideration of charges.

513.C. Hearings and Appeals

An individual fined pursuant to Rule 513.B.2., 3. or 4. may, within 10 days of the decision, file a written appeal with the Market Regulation Department. A written appeal that fails to specify the grounds for the appeal and the specific error or impropriety of the original decision shall be dismissed. The appeal shall be heard by a Panel of the Business Conduct Committee ("BCC Panel") whose decision shall be final. The appellant shall be entitled to be represented by counsel, appear personally before the BCC Panel and present evidence that they may have in support of their appeal. The BCC Panel shall not set aside, modify or amend the appealed decision unless it determines, by majority vote,

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that the decision was:

1. Arbitrary, capricious, or an abuse of the Panel's or Exchange staff's discretion;
2. In excess of the Panel's or Exchange staff's authority or jurisdiction; or
3. Based on a clearly erroneous application of Exchange rules.

514. TRADING INFRACTIONS

A written complaint concerning a trading infraction pursuant to Rule 514.A. may be initiated by members, member firms, trading floor employees of members or member firms or staff of the Exchange. Charges shall be issued and hearings shall be conducted for violations of this rule in accordance with Rule 409.

514.A. Definition

The following shall constitute trading infractions:

1. a bid or offer out of line with the market;
2. a bid or offer which tends to confuse the other traders;
3. a trade through the existing bid or offer;
4. failure to confirm a transaction;
5. failure of a buyer and seller to properly notify the pit reporter of transaction prices in accordance with Rule 528 and/or failure to ascertain that such prices are properly recorded;
6. use of profane, obscene or unbusinesslike language on the trading floor;
7. use of undue force while on, entering or leaving the trading floor;
8. conduct which tends to confuse, distract, abuse or intimidate any Exchange employee;
9. conduct of an unbusinesslike nature;
10. failure to defer to a member who has clearly turned the market;
11. failure to indicate a quantity on a bid or offer; and
12. disseminating false, misleading or inaccurate quotes.

514.B. Floor Conduct Committee Fining Authority

A Panel of the Floor Conduct Committee that finds a member or their employee guilty of violating Rule 514 may impose a fine of up to $10,000 per offense on such member or employee, except that an egregious violation of Rule 514.A.6., 7., 8. or 9. may result in a fine of up to $20,000. Notwithstanding the above, the total fine levied by a Panel against a respondent may not exceed $20,000 based on the single issuance of charges.

If an individual is found guilty of three violations of Rule 514.A. within a rolling one-year period, or any three violations of Rule 514.A.6., 7., 8., and/or 9., within a rolling five-year period, any subsequent alleged violation under Part A. of this rule within such period shall be reviewed by the Market Regulation Department to determine whether to forward the alleged violation to a Panel of the Floor Conduct Committee for adjudication or to investigate and refer the matter to the Chief Regulatory Officer for review. Notwithstanding the above, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Chief Regulatory Officer.

515. REGISTRATION AND IDENTIFICATION OF BROKER ASSOCIATIONS

515.A. Definitions

1. Floor Brokerage Activity - The execution or pre-execution handling of orders on the trading floor.
2. Broker Association - A broker association shall include the following associations between two or more members with trading floor access privileges, at least one of whom is engaged in floor brokerage activity:
   a. Revenue Sharing Association: Associations between members who:
      i. share profits or losses associated with their brokerage and/or error account activity; and/or
      ii. have an employer and employee relationship which relates to floor brokerage activity;
   b. Non-Revenue Sharing Association: Associations between members who:
      i. regularly share a deck of orders; and/or

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ii. share employee salary expenses.

c. Any other group or combination deemed by the Exchange to be a broker association.

3. Principal of a Revenue Sharing Association – Each individual who has formal or de facto control over the affairs of, or has a ten percent or greater ownership interest in, a Revenue Sharing Association not owned by a clearing member firm.

4. Spokesperson of a Non-Revenue Sharing Association and Revenue Sharing Associations owned by a clearing member firm – An individual authorized to represent a Non-Revenue Sharing Association or Clearing Firm owned Revenue Sharing Association in connection with its registration obligations set forth in Section B.

5. Investor – An individual who has a direct beneficial interest in a Revenue Sharing Association but is not a principal as defined in A.3. above.

515.B. Registration Requirements

1. A member of a broker association shall not handle or execute an order unless that association has registered with the Exchange.

2. Members or Member Firms must have majority ownership interest in any broker association.

3. Principals involved in floor brokerage activity must have trading privileges in the membership division required for access to the products handled by the members of the association. Principals who are not involved in floor brokerage activity must own a membership in the membership division required for access to the products handled by the members of the association. Notwithstanding the above, principals not regularly involved in floor brokerage activity may hold a membership in any division in circumstances where the association is owned by a Member Firm and such Member Firm owns a membership in the membership division required for access to the products handled by the members of the association.

4. No registered broker association or member thereof shall permit a party to have any direct or indirect profit or ownership interest in a broker association unless such party is registered in the association in accordance with this rule.

5. Registration shall be accomplished by filing the appropriate registration forms with the Market Regulation Department.

6. It shall be the responsibility of the broker association and its principals or spokespersons to ensure that the association is properly registered. Any additions, deletions or other changes to the information already reported must be provided to the Market Regulation Department within two business days after the event giving rise to such changes.

7. The Exchange may request any additional information from a broker association as deemed appropriate.

515.C. Prohibition on Sharing of Personal Trading Profits

Registrants in a broker association may not share profits or losses associated with their personal trading activity by direct or indirect means, except for profits and losses related to brokerage errors.

515.D. Supervision

Each principal of a Revenue Sharing Association must diligently supervise the association's member registrants and non-member employees and may be held directly liable for violations of any rule of the Exchange by such registrants and employees. Regardless of whether the principal is held responsible for the act or acts constituting the violation, each principal is jointly liable for the payment of any fines assessed against another principal, registrant or employee of the association provided that the violation occurred while that person was functioning in their capacity with the association.

515.E. Trading Restrictions

The Exchange may impose limits on the percentage of personal trading and/or brokerage volume that members of a broker association may execute with one another. Violations of such restrictions will result in summary action according to the following schedule on a rolling 12 month period:

First Occurrence	Letter of Warning
Second Occurrence	$5,000 fine
Subsequent Occurrence	$10,000 fine

The Exchange may restrict a member of a Revenue Sharing Association from trading for any account such member owns, controls or in which such member has a financial interest opposite other members of the association executing orders. Violation of such restrictions will result in summary

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action according to the following schedule on a rolling 24 month period:

First Occurrence	Letter of Warning
Second Occurrence	$500 fine
Third Occurrence	$1,000 fine
Subsequent Occurrence	$5,000 fine

Actions taken pursuant to this section are final and may not be appealed; however members will have 15 days following receipt of notification of the action to present evidence to the Market Regulation Department that administrative, clerical or other errors caused the apparent rule violation.

Notwithstanding the provisions of this section, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Chief Regulatory Officer for consideration of charges.

516. ERROR ACCOUNTS

Each member who acts as a Floor Broker must maintain a designated error account with their qualifying clearing member into which they place brokerage errors. This requirement shall not apply to a Floor Broker who initiates trades or enters orders solely on behalf of a member firm's proprietary account.

Each qualifying clearing member which carries an error account agrees, without qualification, to accept and clear the broker's trades involving brokerage errors.

517.-519. [RESERVED]

TRADING PRACTICES

520. TRADING CONFINED TO EXCHANGE FACILITIES

All trading in Exchange products must occur on or through Exchange facilities and in accordance with Exchange rules.

521. REQUIREMENTS FOR OPEN OUTCRY TRADES

In open outcry trading, bidding and offering practices must at all times be conducive to the competitive execution of transactions. All open outcry transactions, including spread and combination transactions, shall be made openly and competitively in the pit designated for the trading of the particular transaction. No bid or offer shall be specified for acceptance by a particular trader. Transactions may take place only at the best price available in the open outcry market at the time the trade occurs.

It shall be the duty of both traders to confirm their trades as to the price, quantity, commodity, contract month, respective clearing members and, for options, strike price, put or call and expiration month. Confirmation shall take place as soon as possible, but in no event more than 15 minutes after the trade.

522. ACCEPTANCE OF BIDS AND OFFERS

In open outcry and electronic trading, while outstanding, all or any part of any bid or offer is subject to immediate acceptance by any trader. Members are required to honor all bids or offers which have not been withdrawn from the market. The price at which a trade is executed shall be binding, unless such trade is cancelled by Exchange officials in accordance with Exchange rules.

523. ALL-OR-NONE TRANSACTIONS

The Exchange shall determine the minimum thresholds for and the commodities in which All-or-None transactions shall be permitted. The following shall govern All-or-None trading:

1. A member may request an All-or-None bid and/or offer for a specified quantity at or in excess of the applicable minimum threshold. Such request shall be made in the pit designated for the trading of the particular transaction.
2. A member may respond by quoting an All-or-None bid or offer price. A bid or offer in response to an All-or-None request shall be made only when it is the best bid or offer in response to such request, but such price need not be in line with the bids and offers currently being quoted in the regular market.
3. A member shall not execute any order by means of an All-or-None transaction unless the order

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includes specific instructions to execute an All-or-None transaction or the All-or-None bid or offer is the best price available to satisfy the terms of the order.

4. An All-or-None bid or offer may be accepted by one or more members provided that the entire quantity of the All-or-None order is executed at a single price and that each counterparty to the order accepts a quantity at or in excess of the designated minimum counterparty threshold. Each order executed opposite an All-or-None order must be for a quantity that meets or exceeds the minimum counterparty threshold. Separate orders may not be bunched to meet the minimum counterparty threshold.
5. All-or-None transactions shall not set off conditional orders (e.g., Stop Orders and MIT Orders) or otherwise affect orders in the regular market.
6. All-or-None transactions must be reported to a designated Exchange official who shall record and publish the quantity and prices separately from reports of transactions in the regular market. The brokers executing All-or-None transactions must maintain a record of said transaction in accordance with Rule 536.

524. TRADING AT SETTLEMENT ("TAS"), BASIS TRADE AT INDEX CLOSE ("BTIC"), BASIS TRADE AT CASH OPEN ("TACO") AND TRADE MARKER AT CLOSE ("TMAC") TRANSACTIONS

The Exchange shall determine the products, contract months and time periods during which TAS, BTIC, TACO, and TMAC transactions shall be permitted. Specific products, contract months and spreads eligible for pricing as TAS, BTIC, TACO, or TMAC transactions are set forth in the TAS, BTIC, TACO, and TMAC Table ("Table") at the end of Chapter 5.

524.A. Trading at Settlement ("TAS") Transactions

The following shall govern TAS transactions:

1. A TAS order may be entered on Globex at any time the applicable contract is available for TAS trading on Globex and during such TAS-eligible contract's prescribed pre-open time period. The initiation of any TAS order on Globex outside these time periods is prohibited.
2. Unless otherwise specified in the Table, a TAS-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526 or as an Exchange of Futures for Physical ("EFP") or Exchange of Futures for Risk ("EFR") transaction pursuant to the requirements of Rule 538.
3. Unless otherwise specified by the Exchange, a TAS transaction may be executed at the current day's settlement price or at any valid price increment four ticks higher or lower than the settlement price.

524.B. Basis Trade at Index Close ("BTIC") Transactions

A Basis Trade at Index Close ("BTIC") transaction is an Exchange futures transaction which is priced with reference to the closing level of such futures contract's underlying cash Index, or the closing level of a related index as described in the applicable product chapter, on a particular trading day (the "Basis"). The following shall govern BTIC transactions:

1. A BTIC order may be entered on Globex at any time the applicable futures contract is available for BTIC trading on Globex and during such BTIC-eligible futures contract's prescribed pre-open time period. The initiation of any BTIC order on Globex outside these time periods is prohibited.
2. Unless otherwise specified in the Table, a BTIC-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526, except that a BTIC block trade cannot be executed on the last day of trading in an expiring BTIC-eligible futures contract.
3. The Basis established in any BTIC transaction must be stated in admissible price increments for the applicable futures contract as set forth in the applicable product chapter. The assigned futures price corresponding to such BTIC transaction shall be the closing level of the applicable cash Index, or the closing level of a related index as described in the applicable product chapter, for that trading day adjusted by the Basis established in such BTIC transaction. For any BTIC-eligible futures contract, the magnitude of the Basis in a BTIC block trade must be fair and reasonable in light of factors including, but not limited to, financing rates, expected dividend income, and time remaining until the underlying futures contract expiration. A BTIC futures transaction may result in an assigned futures price outside of applicable daily price limits.

   The assigned futures price is deemed final when determined by the Exchange, absent an index price correction by the index provider. If the closing level of a cash Index, or the closing level of

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a related index as described in the applicable product chapter, is corrected by the applicable cash Index provider prior to 4:00 p.m. CT on the following Business Day, the assigned futures price corresponding to such BTIC transaction shall be amended using the corrected closing level of the applicable cash Index, or the closing level of a related index as described in the applicable product chapter, adjusted by the Basis established in such BTIC transaction, and the assigned futures price shall be deemed final at that time.

4. Additional product-specific BTIC provisions, including those relating to disruptions in the publication of an index and the applicable index closing times are set forth in the applicable product chapter in the Rulebook.

524.C. Basis Trade at Cash Open ("TACO") Transactions

A Basis Trade at Cash Open ("TACO") transaction is an Exchange futures transaction that is priced with reference to the next following regularly scheduled special opening quotation ("SOQ") of such futures contract's underlying cash Index (the "Basis"). The following shall govern TACO transactions:

1. A TACO order may be entered on Globex at any time the applicable contract is available for TACO trading on Globex and during such TACO-eligible contract's prescribed pre-open time period. The initiation of any TACO order on Globex outside these time periods is prohibited.
2. Unless otherwise specified in the Table, a TACO-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526, provided that for any expiring TACO-eligible contract, a TACO block trade is prohibited with reference to such contract's cash Index SOQ for the last day of trading in such contract.
3. The Basis established in any TACO transaction must be stated in admissible price increments for the applicable futures contract as set forth in the applicable product chapter. The assigned futures price corresponding to such TACO transaction shall be the next following regularly scheduled SOQ of the applicable cash Index adjusted by the Basis established in such TACO transaction.

   For any TACO-eligible futures contract, the magnitude of the Basis in a TACO block trade must be fair and reasonable in light of factors including, but not limited to, financing rates, expected dividend income, and time remaining until the underlying futures contract expiration. A TACO futures transaction may result in an assigned futures price outside of applicable daily price limits.
4. In the event of a disruption in the primary listing exchange for a given cash Index (or a disruption in the applicable national bourse or market in the case of a given non-US cash Index) such that the administrator of such cash Index is unable to produce a regularly scheduled SOQ, all pending and executed TACO transactions in the corresponding futures contract shall be cancelled by the Exchange. Such disruption shall be declared by the Exchange in its sole discretion.
5. Additional product-specific TACO requirements are set forth in the applicable product chapter in the Rulebook.

524.D. Trade Marker at Close ("TMAC") Transactions

The following shall govern TMAC transactions:

1. A TMAC order may be entered on Globex at any time the applicable contract is available for TMAC
   trading on Globex and during such TMAC-eligible contract's prescribed pre-open time period. The initiation of any TMAC order on Globex outside these time periods is prohibited.
2. Unless otherwise specified in the Table, a TMAC-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526 or as an Exchange of Futures for Physical ("EFP") or Exchange of Futures for Risk ("EFR") transaction pursuant to the requirements of Rule 538.
3. Unless otherwise specified by the Exchange, a TMAC transaction may be executed at the current day's applicable marker price or at any valid price increment four ticks higher or lower than the applicable marker price.

525. [RESERVED]

526. BLOCK TRADES

The Exchange shall designate the products in which block trades shall be permitted and determine the minimum quantity thresholds for such transactions. The following shall govern block trades:

A. A block trade must be for a quantity that is at or in excess of the applicable minimum threshold.

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Orders may not be aggregated in order to achieve the minimum transaction size, except by those entities described in Sections I. and J.

B. Each party to a block trade must be an Eligible Contract Participant as that term is defined in Section 1a(18) of the Commodity Exchange Act.

C. A member shall not execute any order by means of a block trade for a customer unless such customer has specified that the order be executed as a block trade.

D. The price at which a block trade is executed must be fair and reasonable in light of (i) the size of the block trade, (ii) the prices and sizes of other transactions in the same contract at the relevant time, (iii) the prices and sizes of transactions in other relevant markets, including without limitation the underlying cash market or related futures markets, at the relevant time, and (iv) the circumstances of the markets or the parties to the block trade.

E. Block trades shall not set off conditional orders (e.g., Stop Orders and MIT Orders) or otherwise affect orders in the regular market.

F. Unless otherwise agreed to by the principal counterparties to the block trade, the seller, or, in the case of a brokered transaction, the broker handling the block trade, must ensure that each block trade is reported to the Exchange within the time period and in the manner specified by the Exchange. The report must include the contract, contract month, price, quantity of the transaction, the respective clearing members, the time of execution, and, for options, strike price, put or call and expiration month. The Exchange shall promptly publish such information separately from the reports of transactions in the regular market.

G. Block trades must be reported to the Clearing House in accordance with an approved reporting method.

H. Clearing members and members involved in the execution of block trades must maintain a record of the transaction in accordance with Rule 536.

I. A commodity trading advisor ("CTA") registered or exempt from registration under the Act, including, without limitation, any investment adviser registered or exempt from registration under the Investment Advisers Act of 1940, shall be the applicable entity for purposes of Sections A., B., C., and D., provided such advisors have total assets under management exceeding $25 million and the block trade is suitable for the customers of such advisors.

J. A foreign Person performing a similar role or function to a CTA or investment adviser as described in Section I, and subject as such to foreign regulation, shall be the applicable entity for purposes of Sections A., B., C., and D., provided such Persons have total assets under management exceeding $25 million and the block trade is suitable for the customers of such Persons.

527. OUTTRADES, ERRORS AND MISHANDLING OF ORDERS

527.A. Outtrades Discovered During a Regular Trading Hours Trading Session

It shall be the duty of a member discovering an outtrade during a Regular Trading Hours session to immediately notify the opposite trader. Thereafter, if the matter cannot be resolved between the parties, they shall immediately determine who will cover the trade and the trade shall immediately be covered.

527.B. Outtrades Discovered After a Regular Trading Hours Trading Session

A clearing member that is unable with diligent effort to resolve an outtrade with another clearing member shall notify the member who executed the trade. Such notice shall be given prior to the following day's Regular Trading Hours session in sufficient time to allow the member to make provisions for the resolution of the outtrade.

Outtrades discovered after a Regular Trading Hours session shall be resolved between the parties to the outtrade as provided in this rule, no later than the opening of trading of the next Regular Trading Hours session.

527.C. Outtrades Resolution

To resolve an outtrade, the parties shall attempt to agree upon: (1) the reconciliation of any discrepancy in the terms of the trade, (2) which party will cover the trade and the method for covering the trade, if applicable, and (3) the apportionment of the financial results of the outtrade. In the event the parties are unable to agree on the apportionment of the financial results, the parties must nevertheless immediately reconcile the outtrade.

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The price at the time of the open of the next Regular Trading Hours session shall fix the limit of liability as a result of the outtrade. Regardless of the ultimate determination of financial responsibility for the outtrade, a party who unreasonably refuses to cover the outtrade via an appropriate alternate market may be liable to the other party for the difference between the price at which the outtrade could have been covered in the alternate market and the price at the time of the open of the next Regular Trading Hours session.

Outtrades shall be resolved in accordance with the procedures below:

1. Straight Out Customer Outtrades

   If a floor broker discovers that all or some portion of a customer order was executed but cannot be cleared, the broker shall either 1) re-execute the order in the market and adjust the customer by check if the re-execution price is worse than the original execution price, or, if the re-execution price is better than the original execution price, the customer is entitled to the better price or 2) assign the opposite side of the portion that cannot be cleared to their error account and assign a fill to the customer at the execution price. The floor broker shall not liquidate the assigned position until at least ten minutes have elapsed after the execution of the order giving rise to the outtrade and the bracket period in which the outtrade occurred has ended; however, these liquidation restrictions shall not apply to a liquidation during the post close session. Any profits or losses resulting from the liquidation of the assigned position belong to the floor broker and any such profits may be retained or disbursed at their discretion.

   A floor broker who assigns the opposite side of an order pursuant to this rule shall: 1) clearly identify all such transactions by appropriate designation; 2) submit such trade information to their qualifying clearing member in sufficient time to enable the clearing member to submit the trade for the next intra-day reconciliation; 3) document in writing the circumstances surrounding any such transaction and promptly provide such documentation to the Market Regulation Department upon request; and 4) identify the subsequent liquidation of the assigned trade on the floor broker's trading card or other document.

2. Price Outtrades

   When an outtrade exists due to a price discrepancy, members making the trade may choose to resolve the discrepancy by electing either of the two prices in question, if they agree that the trade was executed at that price.

   If an outtrade involves a price discrepancy between a local and a broker, and the members cannot agree on the price of execution, the price recorded by the broker shall be used to clear the trade.

   If an outtrade between locals or an outtrade between brokers involves a price discrepancy, and the members cannot agree on the price of execution, the buyer's price shall be used to clear the trade.

3. Quantity Outtrades

   When an outtrade exists due to a quantity discrepancy, members making the trade may choose to resolve the discrepancy by electing either of the two quantities in question, if they agree that the trade was executed for that quantity.

   If an outtrade between locals involves a quantity discrepancy and the members cannot agree on the quantity that was executed, the higher quantity shall be used to clear the trade.

   A broker may assign the opposite side of any quantity which they believe that they have executed, but which cannot be cleared, to their error account, pursuant to Section 1 above.

4. Bona Fide Contract Month, Strike, Put vs. Call and Side of Market (Buy vs. Buy or Sell vs. Sell) Outtrades

   When an outtrade exists due to a contract month, strike price, side of market, or put/call discrepancy, and any party who executed a customer order believes that the order was executed in accordance with its instructions, the outtrade may be resolved in any one of the following ways:

   a. The trade may be busted. If a broker re-executes their order, any losses incurred by the customer as a result of the delay in execution must be adjusted by check. If the order is executed at a more favorable price, the customer is entitled to the better price.

   b. The members making the trade(s) may agree to clear either trade or both trades in accordance with the members' recorded trade data.

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c. A broker may assign the opposite side of their order to their error account, pursuant to Section 1. above, and they may agree to the clearing of the transaction according to the terms of the other member's recorded trade data.

d. If both members involved in the outtrade are brokers, they may each assign the opposite side of their respective orders to their error accounts pursuant to Section 1. above.

A customer shall not be entitled to any portion of any profits realized by a local who was on the opposite side of an outtrade between the local and the customer's broker, as a result of the local's liquidation of their position. Such profits belong to the local, and may be retained or disbursed at their discretion. If the local chooses to disburse any portion of such profits to the broker, and the broker's customer has received a fill in accordance with the broker's recorded trade data, the broker is not obligated to offer such profits to their customer.

Nothing herein shall in any way limit a member's right to submit an outtrade to Exchange arbitration if the outtrade cannot be resolved by agreement.

527.D. Errors and Mishandling of Orders

If a broker overbuys or oversells for an order, the customer is not entitled to any of the quantity executed in excess of the order quantity. A position that has been established as a result of an erroneous execution or mishandling of an order must be placed in the error account of the broker or firm responsible for the error or order mishandling. Any profits resulting from the liquidation of trades placed in a broker's or firm's error account belong to the relevant broker or firm, and any such profits may be retained or disbursed at the broker's or firm's discretion.

1. Unfilled or Underfilled Orders

   If a broker fails to execute an order or underbuys or undersells for an order, the broker shall do one of the following:

   a. Execute the order or the remainder of the order in the market and adjust the customer by check if the customer is filled at a price less favorable than that to which they were entitled due to the broker's error or mishandling of the order. If the order is filled at a more favorable price, the customer is entitled to the better price.

   b. Execute the order or the remainder of the order in the market. If the order, or the remainder of the order, is filled at a worse price than that to which the customer was entitled but for the error or mishandling, the broker may allocate the fill to their error account, pursuant to Section C.1. above, provide the customer a fill at the price to which the customer was entitled, and place the opposite side of the customer fill into their error account. If the order is filled at a more favorable price, the customer is entitled to the better price.

2. Wrong Contract Month, Wrong Strike, or Wrong Commodity Executions

   When an order has been executed in the wrong contract month, wrong strike price, or wrong commodity, and the erroneous transaction has been placed in the relevant broker's or firm's error account, the error may be corrected by one of the following:

   a. Execution of the order in accordance with its terms, with an adjustment to the customer by check if the order is executed at a worse price as a result of the error or mishandling of the order.

   b. Execution of a spread or combination transaction to execute the order and liquidate the position arising from the initial erroneous execution of the order, whereby one leg of the spread or combination transaction represents the correct execution of the order and the other leg offsets the erroneous position in the broker's or firm's error account. The broker or firm must clearly identify such transactions by appropriate designation, clearly document in writing the circumstances surrounding the nature of the error and promptly provide such documentation to the Market Regulation Department upon request.

3. Wrong Side of Market Executions

   When an order has been executed on the wrong side of the market and the erroneous execution has been placed in the relevant broker's or firm's error account, the order shall be executed in accordance with its terms, with an adjustment to the customer by check if the order is executed at a worse price as a result of the error or mishandling of the order.

528. PRICE REPORTING

Parties to a pit transaction shall properly notify the designated Exchange official of the price at which trades have been consummated. Both parties to a pit trade are required to ensure that such price is

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properly posted.

Whenever a member makes a trade with another member and such trade constitutes a price infraction, they shall 1) immediately break the trade; or 2) satisfy all bids or offers which were adversely affected; or 3) adjust the price of the trade to the price which existed when the price infraction occurred, provided that both parties agree to adjust the price and the terms of any affected orders are satisfied.

The Exchange will report all swap trades as required by applicable CFTC Regulations to CME SDR. Parties to swap trades will be required to provide the Exchange with information, as specified by the Exchange from time to time, to facilitate the Exchange's reporting obligations. In all cases, however, the parties to every trade on the Exchange will be separately responsible for compliance with their own reporting obligations, if any, with respect to such trades under applicable CFTC Regulations.

529. WITHHOLDING ORDERS PROHIBITED

A Member (as defined in Rule 400), or any person entering orders on the Globex platform, shall not withhold or withdraw from the market any order, or any part of an order, for the benefit of any person other than the person placing the order.

530. PRIORITY OF CUSTOMERS' ORDERS

A member shall not buy (sell) a futures contract, buy (sell) a call option, sell (buy) a put option or a swap for their own account, an account in which they have a direct or indirect financial interest, or an account over which they have discretionary trading authority when they are in possession of an executable order for another person to buy (sell) a futures contract, buy (sell) a call option, sell (buy) a put option, or a swap in the same product, regardless of the venue of execution. All contract months in a given futures product, all options on the futures product, and swap product in addition to any corresponding alternative sized (mini or micro) futures or options contracts on a given product or swap, shall be considered the same product for the purposes of this rule.

The foregoing shall not apply to DRT orders provided that the customer has previously consented in writing and evidence of such general consent is indicated on the order with the "WP" (with permission) designation. In the case of a Floor Broker holding a discretionary order for an account described in Rule 547, a "WP" designation on the order shall constitute sufficient evidence of prior consent.

No person shall enter an order into the Globex platform for their own account, an account in which they have a direct or indirect financial interest or an account over which they have discretionary trading authority, including, without limitation, an order allowing discretion as to time and price, when such person is in possession of any order for another person that the Globex platform is capable of accepting.

531. TRADING AGAINST CUSTOMERS' ORDERS PROHIBITED

531.A. General Prohibition

No person in possession of a customer order shall knowingly take, directly or indirectly, the opposite side of such order for their own account, an account in which they have a direct or indirect financial interest, or an account over which they have discretionary trading authority.

531.B. Exceptions

The foregoing restriction shall not apply to the following:

1. Transactions executed in accordance with Rule 527 to resolve bona fide outtrades or errors;
2. Transactions executed pursuant to Rule 538;
3. Block trades executed pursuant to Rule 526;
4. On the Globex platform, a person may knowingly trade against their customer order for their own account, an account in which they have a direct or indirect financial interest, an account over which they have discretionary trading authority, or a proprietary account of their employer, only if the customer order has been entered immediately upon receipt and has first been exposed on the Globex platform for a minimum of 5 seconds in the case of futures or swaps orders or for a minimum of 15 seconds in the case of options orders; and
5. If the transaction was pit traded, a person may knowingly trade against their customer order for their own account, an account in which they have a direct or indirect financial interest, an account over which they have discretionary trading authority, or a proprietary account of their employer, only if: (i) the customer has consented in writing to waive the application of Rule 531.A. no more

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than 12 months prior to the transaction; (ii) the member complies with the requirements set forth in Rule 533 (iii) the member clearly identifies, by appropriate descriptive words, all such transactions, and (iv) the member ensures that it is reported to Exchange price reporting staff for entry into the Exchange Price Reporting System as a cross trade.

532. IMPROPER USE OR DISCLOSURE OF NON-PUBLIC INFORMATION PROHIBITED

Except as permitted by other Exchange rules, including, but not limited to, Rules 526, 538 and 539, no Person shall:

a. Directly or indirectly trade (or enter, cancel, or modify an order) on the basis of material non-public information when they know or reasonably should have known the information was obtained or disclosed through fraud, deception, or in violation of a pre-existing duty (established by law, rule, agreement, understanding, or some other source);

b. Disclose material non-public information when they know or reasonably should have known the disclosure of the information would violate a pre-existing duty (established by law, rule, agreement, understanding, or some other source) owed to another, except when the disclosure is made to an Exchange official, a permitted government official, or is required by law.

c. Solicit or induce another person to disclose material non-public information.

The mere statement of opinions or general market conditions does not constitute a violation of this rule. An order for execution is material and not public information until it has been exposed to the market.

533. SIMULTANEOUS BUY AND SELL ORDERS FOR DIFFERENT BENEFICIAL OWNERS

A member who is in possession of both buy and sell orders for different beneficial owners for the same product and expiration month, and, for a put or call option, the same strike price, may execute such orders for and directly between such beneficial owners provided that in pit trading, a member executing such orders shall first bid and offer by open outcry three times at the same price, stating the number of contracts, and, thereafter, if neither the bid nor the offer is accepted, the orders may be matched in the presence, and with the approval, of a designated Exchange official.

The member making such transactions shall, by appropriate descriptive words or symbols, clearly identify all such transactions on their trading card or other similar record made at the time of the execution. The member executing such trade must ensure that it is reported to Exchange price reporting staff for entry into the Exchange Price Reporting System. Failure to identify the transaction to Exchange price reporting staff as a cross trade shall constitute a violation of this rule.

On the Globex platform, opposite orders for different beneficial owners that are simultaneously placed by a party with discretion over both accounts may be entered into the Globex platform provided that one order is exposed for a minimum of 5 seconds. An order allowing for price and/or time discretion, if not entered immediately upon receipt, may be knowingly entered opposite another order entered by the same firm only if this other order has been entered immediately upon receipt and has been exposed on the Globex platform for a minimum of 5 seconds.

534. WASH TRADES PROHIBITED

No person shall place or accept buy and sell orders in the same product and expiration month, and, for a put or call option, the same strike price, where the person knows or reasonably should know that the purpose of the orders is to avoid taking a bona fide market position exposed to market risk (transactions commonly known or referred to as wash sales). Buy and sell orders for different accounts with common beneficial ownership that are entered with the intent to negate market risk or price competition shall also be deemed to violate the prohibition on wash trades. Additionally, no person shall knowingly execute or accommodate the execution of such orders by direct or indirect means.

535. RESPONSIBILITY OF FLOOR TRADERS AND FLOOR BROKERS

Every Floor Trader and Floor Broker shall assist their clearing member in the clearing of their trades. Every Floor Trader and Floor Broker must leave contact information with the clearing member through which or for which they have traded in order that they may be contacted during the balance of the day in the event there is a discrepancy in the clearing of their trades.

Each Floor Trader and Floor Broker or their designated representative must be available on the

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trading floor to resolve outtrades in contracts in which they executed trades on the previous day no later than 30 minutes prior to the opening of the relevant market (or at such other times as may be designated by Exchange officials). If the trader or broker or their designated representative is not present during such period, the clearing member through which or for which the trader or broker has traded shall be authorized to resolve any outtrade in the manner it deems appropriate, but such resolution shall not be determinative of the liability of any party to the outtrade.

536. RECORDKEEPING REQUIREMENTS FOR PIT, GLOBEX, AND NEGOTIATED TRADES

536.A. General Requirements for Open Outcry Pit Trades

At the time of execution, it shall be the duty of every member to record each trade made for an account the member owns or controls showing the date, price, quantity, product, expiration month, bracket symbol, opposite trader, opposite clearing member and, for options, put or call and strike price. Floor brokers executing an order shall record their trading symbol, price, quantity, bracket, opposite trader and clearing member. Trades or order executions must either be recorded on an approved electronic device or, if recorded on written records, in non-erasable ink.

Members must designate on the trading document used to record a trade whether such trade is a spread trade and record "D" for single line entry differential spreads and "6" for all other spreads.

A member may correct any errors on written trading records by crossing out erroneous trade information without obliterating or otherwise making illegible any of the originally recorded information.

Each member shall provide their clearing member with any trading documents which are relied upon for transactional information necessary for submission to the clearing system containing those trades that have been executed thus far during that day. Trading documents include trading cards of members' personal and proprietary trades, trading cards of one member reflecting trades executed on behalf of another member and floor order tickets. Such trading documents must be submitted and timestamped no later than 15 minutes after the end of each half-hour interval. If a broker has only partially filled an order at the end of a half-hour period, they do not have to submit the document used to record the execution to the appropriate clearing member until the entire order has been filled, the unexecuted portion of the order is cancelled, or the market has closed for that contract, whichever occurs first.

In addition, each member must maintain, and is accountable for, all other documents on which original trade information is recorded, whether or not such information is subsequently endorsed on an order ticket or entered into an approved electronic device. Trading cards used to record the execution of flashed or electronically transmitted orders are not required to have the member's trading symbol pre-printed on them, but such cards must be visually distinct from the pre-printed trading cards used by the member to record trades for accounts they own or controls.

The correct bracket symbol in accordance with the list below must be recorded for each pit trade.

Time Intervals	Bracket Code
Unknown to data entry operator	?
Opening range for each contract	$
Closing range for each contract	%
Post Close Session	#
7:00:00 a.m. – 7:14:59 a.m.	A
7:15:00 a.m. – 7:29:59 a.m.	B
7:30:00 a.m. – 7:44:59 a.m.	C
7:45:00 a.m. – 7:59:59 a.m.	D
8:00:00 a.m. – 8:14:59 a.m.	E
8:15:00 a.m. – 8:29:59 a.m.	F
8:30:00 a.m. – 8:44:59 a.m.	G

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Time Intervals	Bracket Code
8:45:00 a.m. – 8:59:59 a.m.	H
9:00:00 a.m. – 9:14:59 a.m.	I
9:15:00 a.m. – 9:29:59 a.m.	J
9:30:00 a.m. – 9:44:59 a.m.	K
9:45:00 a.m. – 9:59:59 a.m.	L
10:00:00 a.m. – 10:14:59 a.m.	M
10:15:00 a.m. – 10:29:59 a.m.	N
10:30:00 a.m. – 10:44:59 a.m.	O
10:45:00 a.m. – 10:59:59 a.m.	P
11:00:00 a.m. – 11:14:59 a.m.	Q
11:15:00 a.m. – 11:29:59 a.m.	R
11:30:00 a.m. – 11:44:59 a.m.	S
11:45:00 a.m. – 11:59:59 a.m.	T
12:00:00 p.m. – 12:14:59 p.m.	V
12:15:00 p.m. – 12:29:59 p.m.	W
12:30:00 p.m. – 12:44:59 p.m.	X
12:45:00 p.m. – 12:59:59 p.m.	Y
1:00:00 p.m. – 1:14:59 p.m.	Z
1:15:00 p.m. – 1:29:59 p.m.	2
1:30:00 p.m. – 1:44:59 p.m.	3
1:45:00 p.m. – 1:59:59 p.m.	4
2:00:00 p.m. – 2:14:59 p.m.	5
2:15:00 p.m. – 2:29:59 p.m.	6
2:30:00 p.m. – 2:44:59 p.m.	7
2:45:00 p.m. – 2:59:59 p.m.	8
3:00:00 p.m. – 3:15:00 p.m.	9

Trades that are not recorded contemporaneously due to an error or an outtrade shall be recorded on the member's next pre-printed, sequentially numbered trading card. If the trade is not recorded in sequence, the member must cross out the pre-printed sequence number and write "9999" on the card. In any situation where someone other than the member is resolving a member's outtrades, the outtrade clerk or broker's clerk may use a blank card and write "9999" on the card to denote that it is out of sequence. The person resolving the outtrade for a member must initial the card.

Firms must enter an "E" into the order type field to identify any errors placed into a firm error account.

1. Customer Orders

At the time of execution, every order received from a customer must be in the form of a written or electronic record and include an electronic timestamp reflecting the date and time such order was received on the floor of the Exchange and, except as provided in Section C., must identify the specific account(s) for which the order was placed. Such record shall also include an electronic timestamp reflecting the date and time such order was modified, returned, confirmed or cancelled.

Upon request, a clearing firm must provide its broker, in an expeditious and reasonable manner, with a copy of every floor order such broker is asked to execute.

2. Individual Member Orders

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a. A member on the trading floor who enters an order with another member shall record the order instructions and the time of placement to the nearest minute in sequence with the other trades recorded on their pre-sequenced trading cards, unless such order is immediately entered into an approved electronic device or recorded pursuant to Section 2.b. below. Orders that involve options-futures combinations and other spread trades where the initiating member personally executes at least one leg of the spread shall not be subject to this requirement.

   The member executing the order must record the time of execution to the nearest minute for each execution made for the order on the trading card or other document used to record the trade(s) and must return this card or document to the initiating member.

   The trading card used to record the placement of the flashed or verbal order and any trading card or document used to record the execution of the order must be submitted together to the clearing member by the member placing the order or their representative.

b. Every written order that is initiated by a member for their own account while on the trading floor must include an electronic timestamp reflecting the date and time such order was transmitted for execution and when such order was modified, returned, confirmed or cancelled.

c. A member or their employee standing in a trading pit receiving an order directly over a headset for pit execution from an off-floor member for their account must simultaneously make a written record of the order on a trading card or other document including the identification of the member calling in the order unless such order is immediately entered into an approved electronic device. The member executing the order must record the time of execution to the nearest minute for each execution made for the order on any trading card or other document used to record the trade(s) and must return this card or document to the initiating member's clearing member.

3. Proprietary Orders of Clearing Members and Certain Member Entities

Upon receipt on the floor of the Exchange, an order placed for the proprietary account of a member firm must be in the form of a written or electronic record that includes an electronic timestamp reflecting the date and time such order was received on the floor and must identify the specific account(s) for which the order was placed. Such record shall also include an electronic timestamp reflecting the date and time such order was modified, returned, confirmed or cancelled.

Orders placed by an employee of a member firm for its proprietary account that are entered directly to the pit via headset with another employee of the member firm do not require a written and timestamped order ticket provided that the order is executed by a member employee of the member firm and such member records the time of execution to the nearest minute for each execution made for the order on the trading card or other document used to record the trade(s).

4. Trades Made by Members for Accounts Owned or Controlled by Such Member

Each member executing transactions on the trading floor for such member's personal account or an account controlled by such member who uses trading cards as the original record of such transactions must use pre-printed sequentially pre-numbered trading cards. A new trading card must be used at the beginning of each time bracket.

Each member who uses such trading cards must record the transactions in non-erasable ink in exact chronological order of execution on sequential lines of the trading card, and no lines may be skipped. Any lines that remain after the last execution recorded on a trading card must be marked through. All transactions which are recorded on a single trading card must be recorded on the same side of such trading card. No more than six transactions may be recorded on each trading card. Trading card sequence numbers must be unique during a one-week period.

The trading cards must contain pre-printed member identification which will include, but will not be limited to, the trading acronym and the full name of the member. The trading cards must also contain preprinted bracket designations.

Members who use an approved electronic device to record their trades, whether as an original record, or subsequent to recording their trades on trading cards, must record their trades on the device in the exact sequence in which they were executed and must ensure that the correct time bracket is entered for each transaction.

Members trading for an account they own or control shall be accountable for their pre-printed sequentially numbered trading cards, including those cards which are unused or voided.

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536.B. Globex Order Entry

1. General Requirement

Each Globex Terminal Operator entering orders into Globex shall accurately input for each Application Message all fields required to be populated by the CME iLink® Message Specifications set forth in the CME Group Client Systems Wiki in effect at the time, including, but not limited to the: operator ID; price; quantity; product; expiration month; CTI code; manual order indicator; and account number (except as provided in Section C), and, for options, put or call and strike price. The Globex Terminal Operator's operator ID must be present on each Application Message, including order messages, submitted to Globex. For a Globex Terminal Operator with access pursuant to Rule 574, the clearing member that guarantees such access to Globex will be responsible for the Globex Terminal Operator's compliance with this rule with respect to the following fields: operator ID, CTI code, manual order indicator and account number. Notwithstanding, and in accordance with Rule 574, a clearing member must take appropriate action if it has actual or constructive knowledge that a Globex Terminal Operator has failed to accurately input for each Application Message fields required to be populated by this rule.

With respect to orders received by a Globex Terminal Operator which are capable of being immediately entered into Globex, no record other than that set forth above need be made. However, if a Globex Terminal Operator receives an order which cannot be immediately entered into Globex, the Globex Terminal Operator must prepare a written order and include the account designation, date, time of receipt and other information required pursuant to section A.1. above. The order must be entered into Globex when it becomes executable.

2. Electronic Audit Trail Requirements for Electronic Order Routing/Front-End Systems

Entities certified by the Exchange to connect an order routing/front-end system to the Globex platform through the CME iLink® gateway are responsible for ensuring that an audit trail of each message entered into Globex is created. Clearing members guaranteeing a connection to Globex are responsible for maintaining or causing to be maintained the electronic audit trail for such systems. This electronic audit trail must be maintained for a minimum of 5 years, and clearing members must have the ability to produce this data in a standard format upon request of Market Regulation.

Each such electronic audit trail must be complete and accurate and account for every electronic communication such system sends to or receives from Globex.

This electronic audit trail must contain all order entry, order modification, and Globex response receipt times to the highest level of precision achievable by the operating system, but at least to the millisecond. The times captured must not be able to be modified by the person entering the order. The data must also contain all required information and fields which include, but is not limited to, the following:

a record of all fields relating to order entry, including transaction date, product, Exchange code, expiration month, quantity, order type, order qualifier, price, buy/sell indicator, stop/trigger price, order number, unique transaction number, account number, session ID, operator ID, manual order indicator, self-match prevention ID where applicable, host order number, trader order number, clearing member, type of action, action status code, customer type indicator, origin, and timestamps. For executed orders, the audit trail must record the execution time of the trade along with all fill information.

In the case where the guaranteeing Clearing Firm has a direct connect client that is another Clearing Firm or an Equity Member Firm, the Clearing Firm may notify the client Clearing Firm or Equity Member Firm that it is their obligation to maintain the electronic audit trail. Upon execution of this written notice, it shall be the duty of the client Clearing Firm or Equity Member Firm to maintain an electronic audit trail pursuant to this rule. Nothing herein relieves any of the above-referenced firms from compliance with the applicable recordkeeping provisions of CFTC Regulations, including Regulation 1.31 or 1.35.

536.C. Bunched Orders and Orders Eligible for Post Execution Allocation

Bunched orders must be allocated and recorded in accordance with CFTC Regulation 1.35(b) and the NFA's Interpretive Notice related to Compliance Rule 2-10.

A bunched order for pit execution does not require the specific account number to be recorded at the time of order placement or upon the report of execution provided that 1) the order is being placed by an eligible account manager for multiple accounts eligible for post execution allocation or 2) a written, pre-determined allocation scheme has been provided to the futures commission merchant accepting or clearing the order prior to the time the order has been placed. Additionally, at the time of receipt

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on the trading floor, bunched orders that do not contain specific account numbers must contain a series, group, or suspense account indicator which relates directly to the group of accounts for which the order has been placed. A bunched order may be initially cleared into a suspense account provided that the final account-specific allocations are submitted to the clearing system no later than the end of each trading day.

Bunched orders for non-discretionary accounts may be entered for pit execution; however, only the following order types may be bunched: Market on Open, Market on Close, same priced Limit Orders and same priced Stop Orders. Such non-discretionary orders may only be bunched in the following instances:

a. Each order underlying the bunched order must be reduced to writing and include the information required pursuant to Section A.1. above;

b. Allocation of the executions for the bunched orders must be fair and equitable in accordance with the NFA's Interpretive Notice related to Compliance Rule 2-10; and

c. In circumstances where the order is bunched in a member firm's sales office, the party accepting the order must, contemporaneously with the order placement, transmit the individual account numbers and quantities associated with the bunched order to the clearing member firm. Such transmission shall be maintained by the clearing member firm along with the bunched order.

With respect to bunched Globex orders, such orders may be entered using a series designation or suspense account number provided that 1) the order is being placed by an eligible account manager for multiple accounts eligible for post execution allocation or 2) a written, pre-determined allocation scheme that defines the series has been provided to the futures commission merchant accepting or clearing the order prior to the time that such order is entered. In the latter case, if such information has not been provided to the futures commission merchant prior to the time of order entry, each specific account number must be entered into Globex. Additionally, for all such bunched orders executed on Globex, the final account specific allocations must be submitted to the clearing system no later than the end of each trading day.

536.D. Customer Type Indicator (CTI) Codes

Each clearing member must identify each transaction 1) executed on the trading floor, 2) executed on the Globex platform or 3) privately negotiated as a block trade pursuant to Rule 526 or an EFRP pursuant to Rule 538 on the record of the transaction submitted to the Exchange with the correct customer type indicator (CTI) code. The CTI codes are as follows:

CTI 1: Electronic Trading, Open Outcry and Privately Negotiated – Applies to transactions initiated and executed by an individual member for their own account, for an account they control, or for an account in which they have an ownership or financial interest. However, transactions initiated and executed by a member for the proprietary account of a member firm must be designated as CTI 2 transactions.

CTI 2: Electronic Trading, Open Outcry and Privately Negotiated – Applies to orders entered or trades executed for the proprietary accounts of a member firm, including Rule 106.H., I., N., R. and S. firms.

CTI 3: Electronic Trading – Applies to orders entered by a member or a nonmember terminal operator for the account of another individual member or an account controlled by such other individual member.

CTI 3: Open Outcry and Privately Negotiated – Applies to orders that a member executes on behalf of another individual member, or for an account such other member controls or in which such other member has an ownership or financial interest.

CTI 4: Electronic Trading, Open Outcry and Privately Negotiated – Applies to all orders and transactions not included in CTI categories 1, 2 or 3. These typically are orders entered by or on behalf of nonmember entities.

536.E. Negotiated Trades

At the time of execution, every order received from a customer for execution pursuant to Rule 526 ("Block Trades") and Rule 538 ("Exchange for Related Positions") must be in the form of a written or electronic record and include an electronic timestamp reflecting the date and time such order was received, and must identify the specific account(s) for which the order was placed. Such record shall also include an electronic timestamp reflecting the date and time such order was modified, returned, confirmed or cancelled.

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536.F. Audit Trail Violations

With the exception of the specific audit trail violations set forth below, a member's failure to comply with any provision of this Rule may result in the imposition of summary penalties by the Market Regulation Department pursuant to the provisions of Rule 512.

Computerized Trade Reconstruction ("CTR") Monthly Enforcement Program

The CTR threshold levels for members with 100 or more transactions per month are as follows:

Exception Type	Threshold Level
Bracket Exceptions	8% and above
Time of Execution for Verbal Orders	8% and above
Sequence Errors	8% and above

A letter of warning shall be issued for a first occurrence of exceeding any threshold. Subsequent occurrences within 12 months of exceeding a threshold shall result in automatic fines starting at $1,000, and then increasing to $2,500 and $5,000 for each subsequent occurrence. Fifth and subsequent offenses within a 12 month period will be referred to the Chief Regulatory Officer for consideration of charges.

A member will have 15 days after receipt of a letter of warning or a fine to present evidence to the Market Regulation Department in support of having the letter of warning or fine dismissed showing that administrative, clerical, or other errors by the clearing firm caused the member to exceed the threshold level. If the member does not submit such evidence, or if the Market Regulation Department determines that the evidence submitted is insufficient to reduce the percentage below the threshold level, the letter of warning or fine shall be final and may not be appealed.

The monthly CTR threshold for timestamp exceptions for firms with 1,000 or more transactions per month is 8% and above. A letter of warning shall be issued for a first occurrence of exceeding the threshold. Subsequent occurrences within 12 months of exceeding the threshold shall result in automatic fines starting at $1,500 for the second occurrence, then increasing to $5,000 and $10,000 for each subsequent occurrence.

A firm will have 15 days after receipt of a letter of warning or a fine to present evidence to the Market Regulation Department in support of having the letter of warning or fine dismissed. If the firm does not submit such evidence, or if the Market Regulation Department determines that the evidence submitted is insufficient to reduce the percentage below the threshold level, the letter of warning or fine shall be final and may not be appealed.

CTR Clearing Member Back Office Audit Enforcement Program

The Market Regulation Department will conduct audits of clearing members to verify that required audit trail information has been accurately recorded and submitted. The CTR audit threshold level for firms failing to pick up and timestamp sequenced cards, verbal order cards and floor orders is 20%. The threshold for all other firm audit trail or recordkeeping deficiencies is 10%.

Percentage calculations will be made based on an examination of a combination of sequenced cards, verbal orders and floor orders totaling 150 documents. The number of documents containing a deficiency(ies) will be divided by the total number of documents examined in determining the deficiency percentage.

Violations of each threshold within 24 months shall be subject to automatic fines starting at $2,500 for a first occurrence, then increasing to $5,000 and $10,000 for each subsequent occurrence.

A firm will have 15 days after receipt of a fine to present evidence to the Market Regulation Department in support of having the fine dismissed. If the firm does not submit such evidence, or if the Market Regulation Department determines that the evidence submitted is insufficient to reduce the percentage below the threshold level, the fine shall be final and may not be appealed.

Notwithstanding the provisions of this Section, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Chief Regulatory Officer for consideration of charges.

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536.G. Telephone Recordings

Unless specifically exempted by the Market Regulation Department or designated Exchange staff, all headset communications used in and around trading pits on the trading floor must be voice recorded. Members and member firms are permitted to utilize their own recording devices, provided that the devices meet reasonable standards with respect to quality and reliability. Alternatively, members and member firms may utilize an Exchange administered voice recording system for a fee.

536.H. Retention of Records

Each member and member firm and employees of the foregoing must keep full, complete and systematic records, including records created or transmitted electronically, together with all pertinent data and memoranda, of all transactions relating to its business of dealing in commodity interests and related cash or forward transactions in accordance with CFTC Regulation 1.35. Written and electronic records must be retained for a minimum of five years in permanent form. Oral communications required to be recorded pursuant to CFTC Regulation 1.35(a) must be retained for a minimum of one year past the date on which the oral communication occurred. Oral communications recorded by the Exchange pursuant to Section G. will be maintained by the Exchange for a minimum of one year past the date on which the oral communication occurred.

All records required to be retained shall at all times be open to inspection by Exchange staff or any representative of the CFTC or the United States Department of Justice.

537. DATA SUBMITTED TO THE EXCHANGE

a) Subject to each market participant's rights with respect to its own data, the Exchange shall own all rights, title and interest, database rights and trade secret rights in and to all trade data and related information submitted in connection with trading on the Exchange, and which is not collected or received for the purpose of fulfilling regulatory obligations. The Exchange has the exclusive right to use, distribute, sub-license, disclose and sell anonymized trade data and derivative works in any manner, media and jurisdiction. Market participants shall not redistribute trade data or derivative works based thereon unless licensed by the Exchange. The restriction on redistribution shall not apply to a market participant's own data.

b) Proprietary data or personal information collected or received by the Exchange for the purpose of fulfilling regulatory obligations shall not be disclosed publicly other than on an aggregated or anonymized basis, or in a manner that does not directly or indirectly identify any market participant who has submitted such data. Regulatory data may not be used by the Exchange for business or marketing purposes unless the market participant has clearly consented to the use of such data in such manner. Access to the Exchange will not be conditioned upon a market participant's consent to data collected or received for the purpose of fulfilling regulatory obligations being used for business or marketing purposes. Nothing in this Rule shall preclude the Exchange from disclosing data pursuant to a valid subpoena or court order, or as otherwise required by law.

538. EXCHANGE FOR RELATED POSITIONS

An Exchange for Related Position ("EFRP") transaction involves a privately negotiated off-exchange execution of an Exchange futures or options contract and, on the opposite side of the market, the simultaneous execution of an equivalent quantity of the cash product, by-product, related product, or OTC derivative instrument corresponding to the asset underlying the Exchange contract.

The following types of EFRP transactions are permitted to be executed outside of the Exchange's centralized market in accordance with the requirements of this rule:

Exchange of Futures for Physical ("EFP") – the simultaneous execution of an Exchange futures contract and a corresponding physical transaction or a forward contract on a physical transaction.

Exchange of Futures for Risk ("EFR") – the simultaneous execution of an Exchange futures contract and a corresponding OTC swap or other OTC derivative transaction.

Exchange of Option for Option ("EOO") – the simultaneous execution of an Exchange option contract and a corresponding transaction in an OTC option.

For purposes of this rule, EFPs, EFRs and EOOs shall collectively be referred to as EFRP transactions.

538.A. Parties to an EFRP

One party to the EFRP must be the buyer of the Exchange contract and the seller of (or the holder of the short market exposure associated with) the related position; the other party to the EFRP must

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be the seller of the Exchange contract and the buyer of (or the holder of the long market exposure associated with) the related position. The Exchange contract and the corresponding related position must be executed for accounts with the same beneficial ownership.

A third party may facilitate, as principal, the related position component of an EFRP on behalf of a customer. Except for immediately offsetting foreign currency EFPs executed pursuant to Section K., such third party must be able to demonstrate that the related position was passed through to the customer who received the Exchange contract as part of the EFRP.

Specifically with respect to the execution of immediately offsetting foreign currency EFPs pursuant to Section K. by CTAs, account controllers, or other Persons acting on behalf of another party, the initiating and offsetting cash legs are not required to be passed through to the customer who received the Exchange contract as part of the EFRP. However, in a circumstance where the futures leg of the transaction fails to clear, the underlying customer must receive the profit or loss, if any, attendant to the offset of the offsetting cash leg.

Parties to an EFR or EOO transaction must comply with all relevant CFTC regulations governing eligibility to participate in the related position component of such transactions.

538.B. Independently Controlled Accounts

The opposing accounts to an EFRP transaction must be (a) independently controlled accounts with different beneficial ownership; (b) independently controlled accounts of separate legal entities with common beneficial ownership; or (c) independently controlled accounts of the same legal entity, provided that the account controllers operate in separate business units.
For EFRP transactions between accounts with common beneficial ownership, the parties to the trade must be able to demonstrate the independent control of the accounts and that the transaction had economic substance for each party to the trade.

538.C. Related Position

The related position component of an EFRP must be the cash commodity underlying the Exchange contract or a by-product, a related product or an OTC derivative instrument of such commodity that has a reasonable degree of price correlation to the commodity underlying the Exchange contract. The related position component of an EFRP may not be a futures contract or an option on a futures contract.
Each EFRP requires a bona fide transfer of ownership of the underlying asset between the parties or a bona fide, legally binding contract between the parties consistent with relevant market conventions for the particular related position transaction.
The execution of an EFRP transaction may not be contingent upon the execution of another EFRP or related position transaction between the parties where the transactions result in the offset of the related position without the incurrence of market risk that is material in the context of the related position transactions.

The facilitation of the execution of an EFRP by any party that knows such EFRP is non bona fide shall constitute a violation of this Rule.

538.D. EFPs in Connection with Inventory Financing of Storable, Non-Financial Commodities

A party providing inventory financing for a storable agricultural, energy or metals commodity may, through the execution of an EFP, purchase the commodity and sell the equivalent quantity of futures contracts to a counterparty, and grant to the counterparty the non-transferable right, but not the obligation, to execute a second EFP during a specified time period in the future which will have the effect of reversing the original EFP.

538.E. Quantity Equivalence

The quantity of the related position component of the EFRP must be approximately equivalent to the quantity of the Exchange component of the EFRP. Appropriate hedge ratios between the Exchange and related position components of the EFRP may be used to establish equivalency.

538.F. Prices and Price Increments

The Exchange component of the EFRP transaction must be priced in accordance with the applicable futures price increments or option premium increments as set forth in the rules governing the Exchange contract.
EFRPs may be transacted at such commercially reasonable prices as are mutually agreed upon by the parties to the transaction. EFRPs may not be priced to facilitate the transfer of funds between parties for any purpose other than as the consequence of legitimate commercial activity.

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538.G. EFRPs Following the Termination of Trading in Exchange Contracts

EFRP transactions in certain Exchange contracts may be executed for a defined period of time following the termination of trading in accordance with the applicable product rules governing each Exchange contract. Such transactions may be executed only to liquidate Exchange positions.

538.H. Recordkeeping

Parties to an EFRP transaction must maintain all records relevant to the Exchange contract and the related position transaction, including order tickets, records customarily generated in accordance with relevant market practices, records reflecting payments between the parties and, where appropriate, transfer of title, as well as any other records required to be kept pursuant to CFTC Regulation 1.35. Brokers who facilitate EFRP transactions must maintain all records corresponding to their facilitation of the transactions.

Records related to EFRP transactions must be provided to the Exchange upon request. It shall be the responsibility of the carrying clearing member firm to obtain and submit the requested records of their clients to the Exchange on a timely basis.

538.I. Submission to the Clearing House

Each EFRP transaction shall be submitted to the Clearing House within the time period and in the manner specified by the Exchange and the Clearing House. In all cases, the record submitted to the Clearing House must reflect the correct EFRP transaction type and must reflect the accurate date and time at which the relevant terms of the transaction were agreed upon by the parties to the trade. An EFRP transaction submitted to the Clearing House shall not be considered accepted by the Clearing House until the transaction has cleared and the first payment of settlement variation and performance bond has been confirmed.

538.J. EFRP Volumes Required to be Reported with Daily Large Trader Positions

Each clearing member, omnibus account and foreign broker responsible for submitting daily large trader positions in accordance with Rule 561 must submit for each reportable account the EFRP volume bought and sold in the reportable instrument. This information must be included in the daily Large Trader report to the Exchange.

538.K. Immediately Offsetting EFPs in Foreign Currency Futures

EFPs in foreign currency futures wherein the parties immediately offset the cash transaction are permitted and the Exchange would expect to see confirmation statements issued by the bank/foreign exchange dealer party to the Transaction. These confirmation statements should be the type normally produced by the bank/foreign exchange dealer for confirmation of currency deals and should indicate, by name, the identity of the counter party principal to the Transaction. However, in circumstances where the EFP Transaction is between a bank/foreign exchange dealer and a CTA, account controller, or other Person acting on behalf of a third party (such as a commodity pool or fund), the cash side confirmation statement must identify, at minimum, the name of the third party's Carrying Clearing Member and the third party's account number (or other account specific designation), but need not identify the third party by name. These transactions are only permissible as EFPs in foreign currency futures and not in any other asset class or in EFRs or EOOs in foreign currency futures.

539. PREARRANGED, PRE-NEGOTIATED AND NONCOMPETITIVE TRADES PROHIBITED

539.A. General Prohibition

No person shall prearrange or pre-negotiate any purchase or sale or noncompetitively execute any transaction, except in accordance with Sections B. and C. below.

539.B. Exceptions

The foregoing restriction shall not apply to block trades pursuant to Rule 526 or Exchange for Related Positions transactions pursuant to Rule 538.

539.C. Pre-Execution Communications Regarding Globex Trades

Parties may engage in pre-execution communications with regard to transactions executed on the Globex platform where one party (the first party) wishes to be assured that a contra party (the second party) will take the opposite side of the order under the following circumstances:

1. A party may not engage in pre-execution communications with other market participants on behalf of another party unless the party for whose benefit the trade is being made has previously consented to permit such communications.

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2. Parties to pre-execution communications shall not (i) disclose to a non-party the details of such communications or (ii) enter an order to take advantage of information conveyed during such communications except in accordance with this rule.

3. Permissible Entry Methods for Orders

   The following order entry methods for futures, options, spreads and combinations vary by product, as set forth in the Rule 539.C. Crossing Protocols Table ("Table") in the Interpretations Section at the end of Chapter 5.

   a. Globex Cross ("G-Cross")

      The first party's order is entered into the Globex platform first. The second party's order may not be entered into the Globex platform until a period of 5 seconds has elapsed from the time of entry of the first order.

   b. Committed Cross ("C-Cross")

      Following the pre-execution communication, a Request for Cross ("RFC") order which contains both the buy and the sell orders must be entered into the Globex platform. Upon entry of the RFC, the Globex platform will display an indication that a cross will occur in five (5) seconds. In certain products as set forth in the Table in the Interpretations Section at the end of Chapter 5, a certain percentage of the quantity on the RFC will cross if the price of the RFC represents a new best price level or if the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer at the time of submission of the RFC to the Globex platform and a better price for either the buy or sell order has not been entered into the Globex platform during the five (5) second period between entry of the RFC and the cross occurring.

   c. RFQ + RFC Cross ("R-Cross")

      Following the pre-execution communication, a Request for Quote ("RFQ") for the particular futures, options spread or combination must be entered into Globex. Thereafter, the RFC order must be entered no less than fifteen (15) seconds and no more than thirty (30) seconds after the entry of the RFQ in order to proceed with the trade, except the RFC order in Dairy futures and options must be entered no less than five (5) seconds and no more than thirty (30) seconds after the entry of the RFQ. The RFQ and the RFC order must be entered within the same trading session. Failure to enter the RFC order within 30 seconds after the entry of the RFQ will require a new RFQ to be entered prior to the entry of the RFC order, which must be entered in accordance with the time parameters described above in order to proceed with the trade.

540. RESPONSIBILITY FOR CUSTOMER ORDERS

540.A. Standard of Responsibility

A Member (as defined in Rule 400) shall exercise due diligence in the handling and execution of customer orders. Failure to act with due diligence shall constitute negligence. In the case of a dispute as to whether a Member has exercised due diligence, the appropriate arbitration or disciplinary committee is authorized to determine whether the Member was negligent and, if so, whether an adjustment is due to the customer. The committee may take into consideration the nature of the order and existing market conditions, including the existence of a "fast market" (a designation invoked to reflect rapid price changes and volatile market conditions in the pit), at the time the Member acted or failed to act. However, no market condition nullifies a Member's responsibility to exercise due diligence.

A Member is prohibited from directly or indirectly guaranteeing the execution of an order or any of its terms such as the quantity or price. A Member may only report an execution that has occurred as a result of open outcry, has been effected through the Globex platform, or has been executed as a permissible privately negotiated transaction. This rule shall not be construed to prevent a Member from assuming or sharing in the losses resulting from an error or the mishandling of an order.

540.B. Liability for Negligence

A Member may not adjust the price at which an order was executed or be held responsible for executing or failing to execute an order unless such Member was negligent or is settling a bona-fide dispute regarding negligence.

A member firm may not compel an adjustment from a Member in the absence of a bona-fide dispute regarding negligence.

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Clearing members shall document all adjustments. Clearing members shall make and retain a record which contains the date the adjustment was received, the name of the Member making the adjustment, the account to which the adjustment was credited, the amount of the adjustment, the order number and the reason for the adjustment. Such records must be provided to the Market Regulation Department upon request.

541. [RESERVED]

542. SIMULTANEOUS SPREAD AND COMBINATION TRANSACTIONS

A. All spread or combination transactions in which all sides are acquired simultaneously must be for the same account or accounts with the same ownership, except as provided by Rule 527. Each of the respective legs of the spread or combination transaction must be priced within the daily price limits for those contracts that have limits.

Spread or combination transactions shall not set off conditional orders in any contract except for an identical spread or combination conditional order. All simultaneous spread or combination transactions must be reported to a designated Exchange official who shall record and publish the differentials or combination prices in addition to the quantities of such trades. The brokers executing any spread or combination transaction must maintain a record of the transaction in accordance with Rule 536.

For the purposes of this rule, a whole integer price is an option price that is divisible by one tick without remainder (e.g., one tick, two ticks, three ticks, etc.). For the purposes of this rule, a non-integer tick price is an option price that is not divisible by one tick without remainder (i.e., one-half tick or cabinet, one and one-half ticks, and two and one-half ticks). In addition, the rule in an option's contract specifications defining that given option contract's minimum fluctuations also defines that option contract's whole integer and non-integer tick prices for the purposes of this rule.

Spread or combination transactions involving options on interest rate futures contracts trading at non-integer tick prices other than those transactions explicitly defined in this rule are not allowed.

B. Any spread or combination transaction involving cabinet options may trade, provided that the traded price of the combination is zero, cabinet, or 1 tick, as defined by that product's minimum fluctuations.

For the purposes of this rule, a cabinet option is an option trading at a price of one-half tick (except for options on Three–Month Euroyen futures), and a one-tick option is an option trading at a price of one tick. In addition, the rule in an option's contract specifications defining that given option contract's minimum fluctuations also defines that option contract's one-tick price and one-half tick price for the purposes of this rule. Also, the rule in an option's contract specifications defining that given option contract's underlying futures contract also defines that underlying futures contract for the purposes of this rule.

Spread or combination transactions involving cabinet options other than those transactions explicitly defined in this rule are not allowed.

C. [Reserved]

D. Trading is allowed in simultaneous spread or combination transactions involving options on FX futures contracts trading at whole integer and non–integer tick prices, subject to the conditions applying to other spread or combination transactions and also subject to the following respective additional conditions:
1. Spread and combination transactions may trade at a non–integer tick price provided that the net absolute price differential or aggregate combination price, as applicable, is five ticks or less.
2. Conversion and reversal transactions involving the purchase and sale of options and futures are also allowed to trade at one–half tick provided that each component futures is assigned an integer price.

E. [Reserved]

F. On Globex, spread or combination transactions shall be made by inputting the spread differential or combination price into the Globex system.

For combinations traded on Globex in price terms, the Exchange will allocate the combination trade price among the individual options in the combination for clearing purposes.

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543. RESTRICTIONS ON ACCESS FOR SANCTIONED PARTIES AND JURISDICTIONS

The following parties (defined individually as a "Sanctioned Party" and collectively as "Sanctioned Parties") are not permitted to access the Exchange, whether directly or indirectly: parties that are (i) identified on the Specially Designated Nationals and Blocked Persons List of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") ("Restricted Persons"), (ii) 50% or more owned by Restricted Persons, (iii) located in a country or territory subject to comprehensive economic sanctions administered by OFAC ("Restricted Country or Territory " or "Restricted Countries or Territories"), (iv) owned or controlled by the governments of Restricted Countries or Territories, (v) subject to OFAC restrictions where such restriction prohibits a specific activity which would in turn prohibit the party from trading on the Exchange or settling a transaction at the Exchange, (vi) subject to restrictions administered or imposed by a state or government authority authorized to issue economic sanctions and blocking measures that has jurisdiction over a Clearing Member (each a "Sanctioning Body") or (vii) acting on behalf of any of the foregoing.

Unless permitted (either not restricted or specifically authorized) by OFAC and/or any Sanctioning Body, as applicable, (a) any Clearing Member that maintains positions or carries an account actively trading on the Exchange for a Person that is or becomes a Sanctioned Party or (b) any Clearing Member becomes aware, or has documentary information, that it maintains positions or carries an account actively trading on the Exchange on behalf of a Sanctioned Party, shall immediately take steps to (i) cancel all direct and indirect access and authorizations issued to such Sanctioned Party and provide written notice to the Exchange of such cancellations; or (ii) provide written instructions to the Exchange directing the Exchange to assist and coordinate in the cancellation of all access and authorizations for the Sanctioned Party at the Exchange as may be applicable.

544. CLOSING DAY ORDERS

During the last day of trading in an expiring futures contract, all allowable types of orders that reach the trading floor less than 15 minutes prior to the close of trading, except for market, closing, spread, limit and stop orders, will be accepted solely at the risk of the customer on a not-held basis. A broker shall not be responsible for cancellations unless the cancellation reaches the broker at least 15 minutes prior to the close on the last day of trading in an expiring futures contract.

545. [RESERVED]

546. OPENING AND CLOSING RANGES DURING REGULAR TRADING HOURS

Opening and closing ranges shall be established by Exchange staff in consultation with the Pit Committee.

In the event of a disputed opening or closing range or a trade during the opening or closing range that is conspicuously out of line with the market, the final determination of the opening or closing range shall be made by Exchange staff in consultation with the Pit Committee. A change in the opening range will be allowed only if the request for a change is made within 15 minutes of the posting of the range. A change in the closing range will be allowed only if the request for a change is made within 10 minutes of the posting of the range.

547. DISCRETIONARY ORDERS

Other than DRT orders, no Member (as defined in Rule 400) shall accept an order that gives more latitude than price and time in execution of the order, except in accordance with the provisions of Rule 956.

The above restriction shall not apply to those orders:

1. placed by another member for an account owned by such member;
2. placed by the member's immediate family which includes a spouse, parent, child, grandparent, grandchild, brother, sister, aunt, uncle, nephew, niece or in-law; and
3. placed for proprietary accounts of member firms.

548. PRIORITY OF EXECUTION

In pit trading, non-discretionary customer orders shall be executed in accordance with their price and time priority. A member shall not execute a discretionary order, including, without limitation, an order allowing the member discretion as to time and price, while in possession of an executable customer order. No person shall allocate executions in any manner other than an equitable manner.

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Non-discretionary customer orders received by a Globex Terminal Operator shall be entered into Globex in the sequence received. Non-discretionary orders that cannot be immediately entered into Globex must be entered when the orders become executable in the sequence in which the orders were received.

549.-552 [RESERVED]

553. AVERAGE PRICE SYSTEM

553.A. Application of Average Prices

A clearing member may employ the Exchange's Average Price System or a proprietary average pricing system to calculate an average price when multiple execution prices are received on an order or series of orders for futures, options or combination transactions. An order or series of orders executed during the same trading day at more than one price may be averaged pursuant to this Rule only if each order is for the same account or group of accounts and for the same product and expiration month for futures, or for the same product, expiration month, put/call and strike price for options.

553.B. Average Price System Requirements

The requirements enumerated below must be met for transactions that are average priced.

1. The customer must have requested average price reporting prior to order entry.
2. Each individual trade must be submitted and cleared by the Exchange at the executed price. The average price must be confirmed to each customer account.
3. The clearing member carrying the account(s) must submit final account specific allocations in the Exchange's clearing system no later than the end of each trading day.
4. If a clearing member computes average prices internally, it must:
   a. Compute the weighted mathematical average price, as set forth in Section C.;
   b. Subsequently employ the Exchange's Average Price System to 1) facilitate the allocations and 2) ensure that final account specific allocations are submitted to the Exchange's clearing system no later than the end of each trading day; and
   c. Create records to support the calculations and allocations to customer accounts and maintain these records pursuant to CFTC regulations.
5. Proprietary trades of a clearing member may not be average priced with customer trades.

553.C. Computation of Average Price

Upon receipt of an execution or match at multiple prices for an order that is to be average priced, the weighted mathematical average must be computed by: (a) multiplying the number of contracts purchased or sold at each execution price by that price, (b) adding the results together and (c) dividing by the total number of contracts. An average price for a series of orders will be computed based on the average prices of each order in that series. The actual average price or the average price rounded to the next price increment may be confirmed to customers. If a clearing member confirms the rounded average price, the clearing member must round the average price up to the next price increment for a buy order or down to the next price increment for a sell order. The residual created by the rounding process must be paid to the customer. An average pricing system may produce prices that do not conform to whole cent increments. In such cases, any amounts less than one cent may be retained by the clearing member.

553.D. Disclosure

Each clearing member that confirms an average price to a customer must indicate on the confirmation and monthly statement that the price represents an average price.

554.- 558. [RESERVED]

559. POSITION LIMITS AND EXEMPTIONS

The position limit levels applicable to those contracts with position limits are set forth in the Position Limit, Position Accountability and Reportable Level Table ("Table") in the Interpretations Section at the end of Chapter 5.

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A person seeking an exemption from position limits must apply to the Market Regulation Department on forms provided by the Exchange. In order to obtain an exemption from position limits, a person must:

1. Provide a description of the exemption sought, including whether the exemption is for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1 (Bona fide hedging transaction or position), non-enumerated bona fide hedging transactions or positions, or spread positions;
2. Provide a complete and accurate explanation of the underlying exposure related to the exemption request;
3. Agree to promptly provide, upon request by the Market Regulation Department, information or documentation regarding the person's financial condition;
4. Agree to comply with all terms, conditions or limitations imposed by the Market Regulation Department with respect to the exemption;
5. Agree that the Market Regulation Department may, for cause, modify or revoke the exemption at any time;
6. Agree to initiate and liquidate positions in an orderly manner;
7. Agree to comply with all Exchange rules; and
8. Agree to promptly submit a supplemental statement to the Market Regulation Department whenever there is a material change to the information provided in the most recent application.

A person intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Market Regulation Department prior to exceeding such limits. However, a person who establishes a position in excess of position limits and files the required application for bona fide hedging transactions or positions or non-enumerated bona fide hedging transactions or positions with the Market Regulation Department shall not be in violation of this rule provided the filing occurs within five (5) business days after assuming the position except in circumstances where the Market Regulation Department requires a person to file prior to the fifth business day. An application filed after exceeding a limit must include an explanation of the sudden or unforeseen bona fide hedging need. In the event the positions in excess of the limits are not deemed to be exemption-eligible, the applicant and clearing firm will be in violation of speculative limits for the period of time in which the excess positions remained open.

The Market Regulation Department shall, on the basis of the application and any requested supplemental information, determine whether an exemption from position limits shall be granted. The Market Regulation Department may approve, deny, condition or limit any exemption request based on factors deemed by the Department to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner given characteristics of the market for which the exemption is sought.

Nothing in this rule shall in any way limit (i) the authority of the Exchange to take emergency action; or (ii) the authority of the Market Regulation Department to review at any time the positions owned or controlled by any person and to direct that such position be reduced to the position limit provided for in the Table.

A person who has received written authorization from the Market Regulation Department to exceed position limits must annually file an updated application not later than one year following the approval date of the most recent application. Failure to file an updated application will result in expiration of the exemption.

559.A. Bona Fide Hedging Transactions or Positions

The Market Regulation Department may grant exemptions from position limits for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1.

Approved bona fide hedgers may be exempted from Exchange emergency orders that reduce position limits or restrict trading.

559.B. Non-Enumerated Bona Fide Hedging Transactions or Positions

1. Referenced Contracts (as defined in CFTC Regulation §150.1)

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions. For the purposes of this rule, non-enumerated bona fide hedging transactions or positions must meet the definition of a bona fide

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hedging transaction or position in CFTC Regulation §150.1. Any position involving a commodity index contract and one or more referenced contracts will not be recognized as a bona fide hedging transaction or position pursuant to this Section.

2. Contracts Not Subject to Federal Position Limits

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions which are held by or on behalf of an entity or an affiliate of an entity which typically buys, sells or holds positions in the underlying cash market, a related cash market, or a related over-the-counter market and for which the underlying market has a high degree of demonstrated liquidity relative to the size of the positions and where there exist opportunities for arbitrage which provide a close linkage between the futures or options market and the underlying market in question.

Any position involving swaps (excluding pass-through swaps) or commodity index contracts may be recognized as a bona fide hedging transaction or position pursuant to this Section.

559.C. Spread Positions

The Market Regulation Department may grant exemptions from the position limits for an intra-market spread, inter-market spread, intra-commodity spread, and inter-commodity spread, including calendar spread, quality spread, processing spread, product or by-product spread, or futures-options spread positions.

559.D. Aggregation of Positions

For the purpose of applying the position limits in the Table, all positions in accounts for which any person, by power of attorney or otherwise, directly or indirectly controls trading or holds a 10 percent of greater ownership or equity interest must be aggregated with the positions held and trading done by such person. For the purpose of determining the positions in accounts for which any person controls trading or holds a 10 percent or greater ownership or equity interest, positions or ownership or equity interests held by, and trading done or controlled by, two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by, or the trading were done or controlled by, a single person.

Any person that, by power of attorney or otherwise, holds or controls the trading of positions in more than one account or pool with substantially identical trading strategies, must aggregate all such positions in accordance with the provisions of CFTC Regulation 150.4(a)(2).

559.E. Exemptions from Aggregation

Exemptions from aggregation in all products subject to Exchange position limits must comply with the provisions of CFTC Regulation 150.4(b).

Any person claiming an exemption from Exchange position limits under the provisions of CFTC Regulation 150.4(b)(1)(ii), (b)(2), (b)(3), (b)(4), or (b)(7) must provide a notice to the Market Regulation Department which sets forth 1) a description of the relevant circumstances that warrant disaggregation and 2) a statement by a senior officer or executive of the entity certifying that the conditions set forth in the applicable CFTC aggregation exemption provision have been met.

Upon request by the Market Regulation Department, any person claiming an exemption from aggregation under this Section E. must provide any requested information that demonstrates the person meets the applicable requirements for the exemption. Market Regulation, in its sole discretion, may amend, suspend, terminate, or otherwise modify a person's exemption from aggregation for failure to comply with the provisions of this Section E.

In the event of a material change to the information provided in any notice filed under this Section E., an updated or amended notice must be promptly filed with the Market Regulation Department detailing the material change.

559.F. Violations

Violations of position limits and approved exemption limits are subject to the provisions of Rule 562.

560. POSITION ACCOUNTABILITY

A person who owns or controls positions in contracts traded on the Exchange or cleared by the Clearing House in excess of reportable levels or subject to accountability levels shall keep records, including records of their activity in the underlying commodity and related derivative markets, and make such records available, upon request, to the Exchange.

Upon request by the Market Regulation Department, such person shall also provide information

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relating to the positions owned or controlled by that person including, but not limited to, the nature and size of the position, the trading strategy employed with respect to the position, and hedging information, if applicable.

For purposes of this rule, all positions in accounts for which a person, by power of attorney or otherwise, directly or indirectly holds positions or controls trading shall be included with the positions held by such person. Additionally, positions held by two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by a single person.

If the person from whom such records or information is requested fails to comply as directed, the Market Regulation Department may order the reduction of such position, in addition to taking disciplinary action as a result of such failure.

A person who exceeds position accountability or position limit levels as a result of maintaining positions at more than one clearing firm shall be deemed to have waived confidentiality regarding their position and the identity of the clearing members at which the positions are maintained.

A person who holds or controls aggregate positions in excess of specified position accountability levels or in excess of position limits pursuant to an approved exemption shall be deemed to have consented, when so ordered by the Market Regulation Department, not to further increase the positions, to comply with any prospective limit which exceeds the size of the position owned or controlled, or to reduce any open position which exceeds position accountability or position limit levels. Any order to reduce an open position shall be issued by the Chief Regulatory Officer or their designee, if they determine in their sole discretion, that such action is necessary to maintain an orderly market.

A clearing member that carries positions for another person shall be responsible for taking reasonable and diligent actions to effect the timely compliance with any order issued pursuant to this rule upon notification of such order by the Market Regulation Department.

All positions must be initiated and liquidated in an orderly manner.

561. SUBMISSION OF LARGE TRADER POSITIONS AND VOLUME THRESHOLD ACCOUNTS

561.A. Large Trader Reporting

Clearing members, omnibus accounts and foreign brokers shall electronically submit to the Exchange a daily large trader position report of all positions required to be reported as set forth in the Position Limit, Position Accountability and Reportable Level Table, in the Interpretations Section at the end of Chapter 5.

Positions at or above the reportable level in a particular expiration month of a futures contract, in all puts or in all calls of a particular option contract expiration month, or an Exchange-listed swap contract are required to be reported. For an account with reportable positions in a particular contract, all positions, regardless of size, in any contract month and in any contract that aggregates with that contract must be reported.

The daily large trader position report submitted to the Exchange must also include, for each reportable account, 1) the EFRP volume bought and sold in the reportable instrument, by contract month, and for EOOs by put and call strike and 2) the number of delivery notices issued and the number of deliveries stopped in the reportable instrument.

In addition to the large trader position report, clearing members, omnibus accounts and foreign brokers must electronically provide the Exchange with a CFTC Form 102A ("Identification of Special Accounts") accurately identifying the owners, controllers, controlled accounts and any additional information required for each reportable account within three business days of the first day that the account in question becomes a reportable account. Notwithstanding the three business day submission requirement, on the first day that an account becomes reportable, clearing members, omnibus accounts and foreign brokers must, at the direction of the Exchange, provide the following information: account type, reportable account number and names and addresses of the owners and controllers of the account.

The Exchange may require that more than one large trader position report be electronically submitted daily. The Business Conduct Committee or the Market Regulation Department may require reports or additional account identification from any clearing member, omnibus account or foreign broker on a lesser number of positions than reflected in the Position Limit, Position Accountability and Reportable Level Table.

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If any material change causes the information previously submitted to the Exchange to become inaccurate, then such clearing member, omnibus account or foreign broker must electronically submit to the Exchange an updated form reflecting the accurate information within three business days of such changes becoming effective. Additionally, in the absence of any material changes, the Exchange may require the electronic submission of a new form on an annual basis for the maintenance of accurate records. A material change includes, but is not limited to, change of account name, address, controllers or controlled accounts.

561.B. Volume Threshold Reporting

A volume threshold account is any account that meets the volume threshold of contracts traded in a single trading day as defined in CFTC Regulation 15.04. Clearing members, shall electronically submit to the Exchange a CFTC Form 102B ("Identification of Volume Threshold Accounts") accurately identifying account information for volume threshold accounts, including the owners, controllers, controlled accounts and any additional information required by the report within three business days of the first day that the account in question becomes a volume threshold account. Notwithstanding the three business day submission requirement, on the first day that an account becomes reportable, clearing members, omnibus accounts and foreign brokers must, at the direction of the Exchange, provide the following information: account type, reportable account number and names and addresses of the owners and controllers of the account.

If any material change causes the information previously submitted to the Exchange to be inaccurate, then such clearing member, omnibus account or foreign broker must electronically submit to the Exchange an updated form reflecting the accurate information within three business days of such changes becoming effective. Additionally, in the absence of any material changes, the Exchange may require the submission of a new form on an annual basis for the maintenance of accurate records. A material change includes, but is not limited to, change of account name, address, controllers or controlled accounts.

561.C. Obligations of Omnibus Accounts and Foreign Brokers

Failure by an omnibus account or foreign broker to submit required information may result in a hearing by the Business Conduct Committee and result in limitations, conditions or denial of access of such omnibus account or foreign broker to any Exchange market. Notwithstanding the above, clearing members carrying such accounts remain responsible for obtaining and providing to the Exchange information regarding the ownership and control of positions in circumstances where an omnibus account or foreign broker has failed to provide the information to the Exchange. Clearing firms must require their clients to provide accurate and timely owner and control information, including any material changes.

Upon request from the Exchange, clearing members, omnibus accounts and foreign brokers must provide CFTC Form 40.

561.D. Reportable Levels

The large trader reportable levels for all contracts are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations Section at the end of Chapter 5.

Any trading account with a trading volume of 50 or more contracts during a single trading day, in a particular expiration month of a futures contract or in all puts or in all calls of a particular options contract expiration month is a reportable volume threshold account.

[Notwithstanding the foregoing, please see CFTC No-Action Letter 17-45 issued on September 25, 2017.]

562. POSITION LIMIT VIOLATIONS

Any positions, including positions established intraday, in excess of those permitted under the rules of the Exchange shall be deemed position limit violations.

If a position exceeds position limits as a result of an option assignment, the person who owns or controls such position shall be allowed one business day to liquidate the excess position without being considered in violation of the limits. Additionally, if, at the close of trading, a position that includes options exceeds position limits when evaluated using the delta factors as of that day's close of trading, but does not exceed the limits when evaluated using the previous day's delta factors, then the position shall not constitute a position limit violation.

A clearing member shall not be in violation of this rule if it carries positions for its customers in excess of the applicable position limits for such reasonable period of time as the firm may require to discover

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and liquidate the excess positions. For the purposes of this rule, a reasonable period of time shall generally not exceed one business day.

A customer who exceeds the position limits as a result of maintaining positions at more than one clearing member shall be deemed to have waived confidentiality regarding their positions and the identity of the clearing members at which they are maintained. A clearing member carrying such positions shall not be in violation of this rule if, upon notification by the Market Regulation Department, it liquidates its pro-rata share of the position in excess of the limits or otherwise ensures the customer is in compliance with the limits within a reasonable period of time. For purposes of this rule, a reasonable period of time shall generally not exceed one business day.

563.-69. [RESERVED]

570. RESTRICTION ON SALE OF EXCHANGE PRODUCTS IN THE EUROPEAN UNION TO EUROPEAN UNION RETAIL INVESTORS UNDER PRIIPS [PACKAGE RETAIL AND INSURANCE BASED INVESTMENT PRODUCT]

(a) No member shall offer, sell or arrange a transaction in an Exchange Contract for, on behalf of, or with a retail investor in the European Union ("EU Retail Investor"), or otherwise make an Exchange Contract available to an EU Retail Investor, unless (1) a key information document ("KID") has been produced for the product by the Exchange in accordance with the requirements of Regulation (EU) No 1286/2014 (the "PRIIPs Regulation") and (2) the KID has been provided to the EU Retail Investor by the intermediary accepting the order from or clearing the transaction on behalf of the EU Retail Investor.

(b) For the purposes of this rule, "retail investor" shall be defined as any person or entity that does not qualify as a "professional client" as defined in Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments as may be amended, restated or superseded from time to time.

571.-572. [RESERVED]

GLOBEX ELECTRONIC TRADING SYSTEM RULES

573. GLOBEX OPENING

Each business day, Globex will open with a single price for each instrument unless otherwise designated by the Exchange.

Prior to the opening of each Globex Session, Globex will provide an indicative opening price or prices, based on the Globex equilibrium price algorithm described below, and on all pending orders that may be executed on the opening. During the 30–second period prior to the opening, no previously entered orders may be modified or cancelled, although new orders may be entered.

Globex will establish an equilibrium price that will be the opening price. The equilibrium price is the calculated price between sell pressure and buy pressure where the largest volume of trading can occur. The price will be determined in accordance with the following methodology:

1. Any bid at a given price may also be executed at a lower price.
2. Any offer at a given price may also be executed at a higher price.
3. The bid volume at any price is the quantity bid at that price plus the sum of the quantities bid at all higher prices.
4. The offer volume at any price is the quantity offered at that price plus the sum of the quantities offered at all lower prices.
5. Sell pressure occurs when the offer volume exceeds the bid volume at a particular price.
6. Buy pressure occurs when the bid volume exceeds the offer volume at a particular price.
7. The trade volume at any price is the smaller of the bid volume or the offer volume.
8. The price overlap is the range of prices where trades are possible.
9. The equilibrium is the price range within the price overlap where buy pressure changes to sell pressure.
10. The equilibrium price is one of the following:
    (a) The price within the equilibrium that has the largest trade volume and the lowest unmatched

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volume at that price remaining after the opening.

or

(b) If more than one price has the same trade volume and the same unmatched volume at that price, the equilibrium price is the one nearest the previous day's settlement price.

11. If there is no equilibrium (there is only buy pressure or sell pressure), there will be no opening price until a trade occurs unless there is a bid higher than, or an offer lower than, the previous day's settlement price.
12. After the provisional opening price is determined as set forth above for all orders excluding stop and stop limit orders, the calculations are repeated with any such orders that would be triggered at such price included until a new provisional opening price is determined. If such new price would trigger additional stop or stop limit orders, the process is repeated until no more orders are triggered.
13. Bids and offers will be selected for matching at the opening price based on price and time priority.

574. GLOBEX ACCESS RESTRICTIONS

All connections to the Globex system must be guaranteed by a clearing member that assumes financial responsibility for all activity through the connection. With respect to transactions given up to other clearing members, such guarantee is effective only until such time that the other clearing member accepts the trade.

Where required under CFTC regulations, all individuals entering non-member customer orders in other than a clerical capacity must have appropriate CFTC registration. Non-member customer orders may be entered only from designated areas on the floor of the Exchange, from the premises of an entity registered to conduct customer business, or any other location designated by such entity.

Clearing members shall assist the Exchange in any investigation into potential violations of the rules or the Act which occur through or with respect to a Globex connection guaranteed by the clearing member. Such assistance must be timely and may include, but not be limited to, requiring any Person to produce documents, to answer questions from the Exchange, and/or to appear in connection with an investigation.

Clearing members shall suspend or terminate a Person's Globex access if the Exchange determines that the actions of the Person threaten the integrity or liquidity of any contract or violate any Exchange rule or the Act, or if the Person fails to cooperate in an investigation.

If a clearing member has actual or constructive notice of a violation of Exchange rules in connection with the use of Globex by any Person for which it has authorized a direct connection and the clearing member fails to take appropriate action, the clearing member may be found to have committed an act detrimental to the interest or welfare of the Exchange.

575. DISRUPTIVE PRACTICES PROHIBITED

All orders must be entered for the purpose of executing bona fide transactions. Additionally, all non-actionable messages must be entered in good faith for legitimate purposes.

A. No person shall enter or cause to be entered an order with the intent, at the time of order entry, to cancel the order before execution or to modify the order to avoid execution;

B. No person shall enter or cause to be entered an actionable or non-actionable message(s) with intent to mislead other market participants;

C.1. No person shall enter or cause to be entered an actionable or non-actionable message(s) with intent to overload or delay the systems of the Exchange or other market participants;

C.2. No person shall intentionally or recklessly submit or cause to be submitted an actionable or non-actionable message(s) that has the potential to disrupt the systems of the Exchange; and

D. No person shall enter or cause to be entered an actionable or non-actionable message(s) with intent to disrupt, or with reckless disregard for the adverse impact on, the orderly conduct of trading or the fair execution of transactions.

To the extent applicable, the provisions of this Rule apply to open outcry trading as well as electronic trading activity. Further, the provisions of this Rule apply to all market states, including the pre-opening period, the closing period and all trading sessions.

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576. IDENTIFICATION OF GLOBEX TERMINAL OPERATORS

Each Globex Terminal Operator shall be identified to the Exchange, in the manner prescribed by the Exchange, and shall be subject to Exchange rules. If operator IDs are required to be registered with the Exchange, it is the duty of the clearing member to ensure that registration is current and accurate at all times. Each individual must use a unique operator ID to access Globex. In no event may a person enter an order or permit the entry of an order by an individual using an operator ID other than the individual's own unique operator ID.

577. [RESERVED]

578. LIMITATION OF LIABILITY, NO WARRANTIES

A. EXCEPT AS PROVIDED BELOW, THE EXCHANGE, THE BOARD OF TRADE OF THE CITY OF CHICAGO, INC. ("CBOT"), THE NEW YORK MERCANTILE EXCHANGE INC. ("NYMEX") (INCLUDING EACH OF THEIR RESPECTIVE SHAREHOLDERS) ALONG WITH ANY OTHER PARTICIPATING EXCHANGE, (INCLUDING EACH OF THEIR RESPECTIVE SUBSIDIARIES AND AFFILIATES), THEIR RESPECTIVE OFFICERS, DIRECTORS, EMPLOYEES, AGENTS, CONSULTANTS, LICENSORS, MEMBERS, AND CLEARING MEMBERS, SHALL NOT BE LIABLE TO ANY PERSON FOR ANY LOSSES, DAMAGES, COSTS OR EXPENSES (INCLUDING, BUT NOT LIMITED TO, LOSS OF PROFITS, LOSS OF USE, AND DIRECT, INDIRECT, INCIDENTAL, CONSEQUENTIAL OR PUNITIVE DAMAGES), ARISING FROM:

(i) ANY FAILURE, MALFUNCTION, FAULT IN DELIVERY, DELAY, OMISSION, SUSPENSION, INACCURACY, INTERRUPTION, TERMINATION, OR ANY OTHER CAUSE, IN CONNECTION WITH THE FURNISHING, PERFORMANCE, OPERATION, MAINTENANCE, USE OF OR INABILITY TO USE ALL OR ANY PART OF ANY OF THE SYSTEMS AND SERVICES OF THE EXCHANGE OR SERVICES, EQUIPMENT OR FACILITIES USED TO SUPPORT SUCH SYSTEMS AND SERVICES, INCLUDING WITHOUT LIMITATION ELECTRONIC ORDER ENTRY/DELIVERY, TRADING THROUGH ANY ELECTRONIC MEANS, ELECTRONIC COMMUNICATION OF MARKET DATA OR INFORMATION, WORKSTATIONS USED BY MEMBERS AND AUTHORIZED EMPLOYEES OF MEMBERS, PRICE REPORTING SYSTEMS AND ANY AND ALL TERMINALS, COMMUNICATIONS NETWORKS, CENTRAL COMPUTERS, SOFTWARE, HARDWARE, FIRMWARE AND PRINTERS RELATING THERETO; OR

(ii) ANY FAILURE OR MALFUNCTION, FAULT IN DELIVERY, DELAY, OMISSION, SUSPENSION, INACCURACY, INTERRUPTION OR TERMINATION, OR ANY OTHER CAUSE, OF ANY SYSTEM OR SERVICE OF THE EXCHANGE OR SERVICES, EQUIPMENT OR FACILITIES USED TO SUPPORT SUCH SYSTEMS OR SERVICES, CAUSED BY ANY THIRD PARTIES INCLUDING, BUT NOT LIMITED TO, INDEPENDENT SOFTWARE VENDORS AND NETWORK PROVIDERS; OR

(iii) ANY ERRORS OR INACCURACIES IN INFORMATION PROVIDED BY THE EXCHANGE OR ANY EXCHANGE SYSTEMS, SERVICES OR FACILITIES; OR

(iv) ANY UNAUTHORIZED ACCESS TO OR UNAUTHORIZED USE OF ANY EXCHANGE SYSTEMS, SERVICES OR FACILITIES BY ANY PERSON.

THE FOREGOING LIMITATION OF LIABILITY SHALL APPLY WHETHER A CLAIM ARISES IN CONTRACT, TORT, NEGLIGENCE, STRICT LIABILITY, CONTRIBUTION OR OTHERWISE AND WHETHER THE CLAIM IS BROUGHT DIRECTLY OR AS A THIRD PARTY CLAIM.

THE FOREGOING LIMITATION OF LIABILITY SHALL BE SUBJECT TO THE COMMODITY EXCHANGE ACT AND REGULATIONS THEREUNDER. A PARTY WHO HAS BEEN FINALLY ADJUDICATED TO HAVE ENGAGED IN WILLFUL OR WANTON MISCONDUCT MAY NOT AVAIL ITSELF OF THE PROTECTIONS IN THIS RULE.

B. THERE ARE NO EXPRESS OR IMPLIED WARRANTIES OR REPRESENTATIONS (INCLUDING BUT NOT LIMITED TO WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE OR USE) PROVIDED BY THE EXCHANGE, CBOT, NYMEX OR ANY PARTICIPATING EXCHANGE (INCLUDING THEIR RESPECTIVE SUBSIDIARIES AND AFFILIATES), THEIR RESPECTIVE OFFICERS, DIRECTORS, EMPLOYEES, AGENTS, CONSULTANTS, AND LICENSORS RELATING TO ANY SYSTEMS OR SERVICES OF THE

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EXCHANGE OR SERVICES, EQUIPMENT OR FACILITIES USED TO SUPPORT SUCH SYSTEMS OR SERVICES, INCLUDING THE GLOBEX SYSTEM.

C. ANY DISPUTE ARISING OUT OF THE USE OF SYSTEMS OR SERVICES OF THE EXCHANGE OR SERVICES, EQUIPMENT OR FACILITIES USED TO SUPPORT SUCH SYSTEMS OR SERVICES IN WHICH THE EXCHANGE (INCLUDING ITS SUBSIDIARIES AND AFFILIATES), OR ANY OF ITS OFFICERS, DIRECTORS, EMPLOYEES, AGENTS, CONSULTANTS OR LICENSORS IS A PARTY SHALL BE ARBITRATED PURSUANT TO EXCHANGE RULES. ANY ARBITRATION SHALL BE BROUGHT WITHIN THE PERIOD PRESCRIBED BY EXCHANGE RULES. ANY OTHER ACTIONS, SUITS OR PROCEEDINGS AGAINST ANY OF THE ABOVE MUST BE BROUGHT WITHIN TWO YEARS FROM THE TIME THAT A CAUSE OF ACTION HAS ACCRUED. THIS PARAGRAPH C SHALL IN NO WAY BE CONSTRUED TO LIMIT A PARTY'S OBLIGATION TO ARBITRATE ITS CLAIM OR TO CREATE A CAUSE OF ACTION AND SHALL NOT AUTHORIZE AN ACTION THAT WOULD OTHERWISE BE PROHIBITED BY EXCHANGE RULES. IF FOR ANY REASON, A COURT OF COMPETENT JURISDICTION FINDS THAT SUCH DISPUTE IS NOT ARBITRABLE, SUCH DISPUTE MAY ONLY BE LITIGATED IN THE COUNTY OF COOK IN THE STATE OF ILLINOIS AND WILL BE GOVERNED BY THE LAWS OF THE STATE OF ILLINOIS WITHOUT REGARD TO ANY PROVISIONS OF ILLINOIS LAW THAT WOULD APPLY THE SUBSTANTIVE LAW OF A DIFFERENT JURISDICTION.

D. THE EXCHANGE, CBOT AND NYMEX MAY, IN THEIR SOLE DISCRETION, ASSUME RESPONSIBILITY FOR DIRECT, OUT-OF-POCKET LOSSES DIRECTLY CAUSED BY THE NEGLIGENCE OF GLOBAL COMMAND CENTER OR OTHER EXCHANGE STAFF AND/OR ORDER STATUS ERRORS PROVIDED BY THE GLOBAL COMMAND CENTER AND/OR THE CLEARING CUSTOMER SERVICE DESK. IF SUCH LIABILITY IS ACCEPTED, THE TOTAL AGGREGATE OBLIGATIONS FOR THE EXCHANGE, CBOT AND NYMEX SHALL NOT EXCEED $200,000 FOR ALL LOSSES SUFFERED FROM ALL CAUSES IN A SINGLE CALENDAR MONTH, EXCEPT FOR LOSSES CAUSED BY PHANTOM ORDERS WHICH ARE SUBJECT TO THE PROVISIONS OF PARAGRAPHS F. AND G. BELOW. ANY DISPUTED CLAIM MADE UNDER THIS RULE MUST BE ARBITRATED PURSUANT TO EXCHANGE RULES.

E. IN NO EVENT SHALL THE COLLECTIVE TOTAL AGGREGATE LIABILITY FOR THE EXCHANGE, CBOT AND NYMEX FOR ALL CLAIMS ARISING OUT OF ANY NEGLIGENCE, FAILURES, MALFUNCTIONS, FAULTS IN DELIVERY, DELAYS, OMISSIONS, SUSPENSIONS, INACCURACIES, INTERRUPTIONS, TERMINATIONS, ORDER STATUSING ERRORS OR ANY OTHER CAUSES, EXCEPT FOR PHANTOM ORDERS WHICH ARE SUBJECT TO THE PROVISIONS OF PARAGRAPHS F. AND G. BELOW, IN CONNECTION WITH THE FURNISHING, PERFORMANCE, OPERATION, MAINTENANCE, USE OF OR INABILITY TO USE ALL OR ANY PART OF ANY OF THE EXCHANGE'S SYSTEMS OR SERVICES, OR SERVICES, EQUIPMENT OR FACILITIES USED TO SUPPORT SUCH SYSTEMS AND SERVICES, OR THE NEGLIGENCE OF EXCHANGE STAFF, EXCEED $200,000 IN ANY CALENDAR MONTH.

   IF THE NUMBER OF ALLOWED CLAIMS ARISING OUT OF ANY FAILURES OR MALFUNCTIONS IN A SINGLE CALENDAR MONTH CANNOT BE FULLY SATISFIED BECAUSE OF THE MONTHLY LIABILITY LIMITATION, ALL SUCH CLAIMS SHALL BE LIMITED TO A PRO RATA SHARE OF THE MAXIMUM AMOUNT AVAILABLE FOR THAT MONTH.

F. NOTWITHSTANDING THE FOREGOING, THE EXCHANGE, CBOT AND NYMEX MAY, IN THEIR SOLE DISCRETION, ASSUME RESPONSIBILITY FOR DIRECT, OUT-OF-POCKET NET LOSSES DIRECTLY CAUSED BY PHANTOM ORDERS (AS DEFINED BELOW). IF SUCH LIABILITY IS ACCEPTED, THE TOTAL AGGREGATE OBLIGATIONS FOR THE EXCHANGE, CBOT AND NYMEX SHALL NOT EXCEED $5,000,000 FOR ALL SUCH LOSSES SUFFERED IN A SINGLE CALENDAR MONTH. ANY DISPUTED CLAIM MADE UNDER THIS RULE MUST BE ARBITRATED PURSUANT TO EXCHANGE RULES.

   FOR THE PURPOSES OF THIS RULE AND RULE 588, A PHANTOM ORDER IS AN ORDER: 1) THAT WAS NOT AUTHORIZED BY A PERSON BUT WAS CAUSED BY A FAILURE, MALFUNCTION OR NEGLIGENT OPERATION OF GLOBEX OR ANY OTHER EXCHANGE SYSTEM, SERVICE OR FACILITY, OR 2) WHOSE TERMS (E.G. CONTRACT, CONTRACT MONTH, QUANTITY, PRICE OR DIRECTION) WERE CHANGED WITHOUT

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AUTHORIZATION OF THE PERSON PLACING THE ORDER SOLELY AS A RESULT OF A FAILURE, MALFUNCTION, OR NEGLIGENT OPERATION OF GLOBEX OR ANY OTHER EXCHANGE SYSTEM, SERVICE OR FACILITY.

G. IN NO EVENT SHALL THE COLLECTIVE TOTAL AGGREGATE LIABILITY FOR THE EXCHANGE, CBOT AND NYMEX FOR DIRECT, OUT-OF-POCKET NET LOSSES DIRECTLY CAUSED BY PHANTOM ORDER(S) EXCEED $5,000,000 IN A SINGLE CALENDAR MONTH. COMPLIANCE WITH THE TERMS OF RULE 588.F. IS REQUIRED IN ORDER FOR LOSSES TO BE CONSIDERED BY THE EXCHANGE PURSUANT TO THIS RULE.

IF THE AMOUNT OF DIRECT, OUT-OF-POCKET NET LOSSES DIRECTLY CAUSED BY PHANTOM ORDERS IN A SINGLE CALENDAR MONTH CANNOT BE FULLY SATISFIED BECAUSE OF THE MONTHLY LIABILITY LIMITATION, ALL SUCH LOSSES SHALL BE LIMITED TO A PRO RATA SHARE OF THE MAXIMUM AMOUNT AVAILABLE FOR THAT MONTH.

A CLAIM AGAINST THE EXCHANGE, CBOT OR NYMEX ARISING OUT OF ANY FAILURE, MALFUNCTION OR PHANTOM ORDER SHALL BE STRICTLY SUBJECT TO THE RESPECTIVE LIABILITY LIMITS OF THIS RULE.

579. GLOBAL COMMAND CENTER ("GCC")

579.A. GCC Authority

The GCC has the authority to take any action deemed appropriate to preserve market integrity in CME Group markets. Such actions include, but are not limited to, the halting of trading, modifying risk-mitigating parameters including price bands, velocity logic and special price fluctuation limits as described in Rule 589, restricting customer access to Globex or any other actions deemed to be in the best interest of the Exchange. In the event any action taken pursuant to this Rule is in response to an emergency as defined in CFTC Regulation 40.1(h), the CFTC shall be notified of the emergency action in accordance with CFTC Regulations.

579.B GCC Services

The GCC provides production support and problem management to all market participants. In addition to this support, the GCC also provides critical assistance to registered contacts. Critical assistance includes, but is not limited to, inquiries and/or actions involving order status and order cancellations. Exchange liability for GCC services is subject to the limitations and conditions of Rule 578.

579.C Order Status

A person who believes they have received an incorrect order status or does not receive an appropriate status shall immediately notify the GCC. In the event that the GCC and an Exchange system, service or facility provide conflicting information relating to an order status, a person may only reasonably rely on the information received from the GCC. Additionally, such person shall take any necessary and appropriate market action to mitigate any potential losses arising from the incorrect order status or lack of appropriate order status immediately after the person knew or should have known that the order status information was incorrect or should have been received.

580. CME GLOBEX TRADE MATCHING ALGORITHMS

The CME Globex platform employs multiple predefined sets of matching algorithms used to match trades on the platform. Information concerning the matching algorithm applicable to a particular product is set forth on the GCC Product Resources page on the CME Group website available here. Information on the operation of the matching algorithms is available here.

581.-582. [RESERVED]

583. DOMESTIC CROSS-EXCHANGE TRADING

583.A. Cross-Exchange Trading by Members of Other Domestic Exchanges in Contracts Listed on Globex

Individual members and clearing members of another domestic exchange that is participating in cross-exchange trading through Globex are eligible to obtain cross-exchange access, for proprietary and customer trading activity, to the contracts listed on Globex. The contracts may be listed on Globex either by the CME ("CME contracts") or by a domestic exchange other than CME ("Domestic Exchange contracts"). Such members and clearing members must (1) be authorized by CME to

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enter orders in CME contracts or Domestic Exchange contracts, as applicable, through Globex, (2) make an arrangement with an appropriate clearing member to clear any trades in CME contracts, (3) make an arrangement with a clearing member of the domestic exchange to clear any trades in such Domestic Exchange's contracts, and (4) abide by the Globex trading rules, policies and procedures of CME when trading CME contracts and Domestic Exchange contracts through Globex.

When an individual member or clearing member of a domestic exchange is found to have violated CME's Globex trading rules, CME may deny or suspend the privilege of cross-exchange trading of such individual member or clearing member.

583.B. Cross-Exchange Trading by Members of CME in Contracts Listed on Globex or Other Electronic Trading Systems by Participating Domestic Exchanges

Individual members and clearing members of CME may obtain cross-exchange access, for proprietary and customer trading activity, to Domestic Exchange contracts listed on Globex or the contracts of a domestic exchange listed on such domestic exchange's electronic trading system. Such members and clearing members must (1) be authorized by the domestic exchange to enter orders in that exchange's contracts either through Globex or through such domestic exchange's electronic trading system, (2) make an arrangement with a clearing member of such domestic exchange to clear any trades in Domestic Exchange contracts listed on Globex or contracts listed by that domestic exchange on its electronic trading system, and (3) abide by the Globex trading rules, policies and procedures when trading Domestic Exchange contracts listed by that domestic exchange on Globex or the rules of the domestic exchange when trading contracts on such domestic exchange's electronic trading system.

584.-587. [RESERVED]

588. TRADE CANCELLATIONS AND PRICE ADJUSTMENTS

588.A. Global Command Center Authority Regarding Trade Cancellations and Price Adjustments

The following shall be applied to balance the adverse effects on market integrity of executing trades and publishing trade information inconsistent with prevailing market conditions while preserving legitimate expectations of trade certainty by market participants. This rule authorizes the Global Command Center ("GCC") to adjust trade prices or cancel trades where, in its absolute and sole discretion, the GCC believes such action is necessary to mitigate market disrupting events caused by the improper or erroneous use of the electronic trading system or by system defects. Notwithstanding any other provisions of this rule, the GCC may, in its absolute and sole discretion, adjust trade prices or cancel any trade if it believes that allowing the trade(s) to stand as executed could have a material, adverse effect on the integrity of the market. All decisions of the GCC shall be final. Subject to the limitations and conditions of Rule 578, and irrespective of the terms of any order entered into Globex, the Exchange shall not have any liability for losses resulting from price adjustments or trade cancellations by the GCC under this Rule.

588.B. Review of Trades

The GCC may determine to review a trade based on its independent analysis of market activity or upon request for review by a user of the electronic trading system. A request for review must be made to the GCC via telephone within eight minutes of the execution of the trade. Any other form of communication with the GCC will not constitute a request for review as set forth in this Section. GCC phone numbers are available on the CME Group website.

The GCC shall determine whether or not a trade will be subject to review. In the absence of a timely request for review, during volatile market conditions, upon the release of significant news, or in any other circumstance in which the GCC deems it to be appropriate, the GCC may determine, in its sole discretion, that a trade shall not be subject to review.

Upon deciding to review a trade, the GCC will promptly issue an alert indicating that the trade is under review.

588.C. Price Adjustments and Cancellations

Upon making a determination that a trade will be subject to review, the GCC will first determine whether the trade price is within the Non-Reviewable Range, as described in Section H. In applying the Non-Reviewable Range, the GCC shall determine the fair value market price for that contract at the time the trade under review occurred. The GCC may consider any relevant information, including, but not limited to, the last trade price in the contract or a better bid or offer price on the electronic

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trading system, a more recent price in a different contract month, the price of the same or related contract established in another venue or another market, the market conditions at the time of the trade, the theoretical value of an option based on the most recent implied volatility and responses to a Request for Quote (RFQ).

1. Trade Price Inside the Non-Reviewable Range

   If the GCC determines that the price of the trade is inside the Non-Reviewable Range, the GCC will issue an alert indicating that the trade shall stand.

2. Trade Price Outside the Non-Reviewable Range

   If the GCC determines that a trade price is outside the Non-Reviewable Range the trade price shall be adjusted to a price that equals the fair value market price for that contract at the time the trade under review occurred, plus or minus the Non-Reviewable Range. In the event there are multiple parties, prices and/or contracts involved in the transactions at issue, the GCC has the authority, but not the obligation, to cancel rather than price adjust such transactions. The GCC will issue an alert regarding its decision.

Cancelled trade prices and any prices that have been adjusted shall be cancelled in the Exchange's official record of time and sales. Trades that are price adjusted shall be inserted in the time and sales record at the adjusted trade price.

588.D. Alternative Resolution by Agreement of Parties

If the GCC determines that the price of a trade is inside the Non-Reviewable Range, no alternative action may be taken under this Rule by the parties to the trade.

With the approval of the GCC, parties to a trade that is price adjusted may instead mutually agree to cancel the trade. With the approval of the GCC, parties to a trade that is cancelled may instead mutually agree to price adjust the trade to a price consistent with the adjustment provisions of Section C.

Parties to a trade that is cancelled or price adjusted may mutually agree to a cash adjustment provided that such adjustments are reported to the GCC and the parties maintain a record of the adjustment.

A trade that is not cancelled may not be reversed via a prearranged offsetting transaction unless such transactions are permitted and effected in accordance with Rule 539.C.

588.E. Liability for Losses Resulting from Price Adjustments or Cancellations and Prohibition on Claims for Losses Arising From Error Trades Executed Within the Non-Reviewable Range

A party entering an order that results in a price adjustment or trade cancellation shall be responsible for demonstrated claims of realized losses incurred by persons whose trade prices were adjusted or cancelled provided, however, that a claimant shall not be entitled to compensation for losses incurred as a result of the claimant's failure to take reasonable actions to mitigate the loss.

A claim for a loss pursuant to this section must be submitted to the Exchange on an Exchange claim form within five business days of the event giving rise to the claim. The Exchange shall reject any claim that is not filed in a timely manner or is not permitted by this section and such decisions shall be final. Eligible claims shall be forwarded by the Exchange to the party responsible for the order(s) that resulted in a trade cancellation or a price adjustment and to the clearing member through which the trade was placed. Such party, or the clearing member on behalf of the party, shall, within ten business days of receipt of the claim, admit or deny responsibility in whole or in part. Failure to respond to the claim within ten business days shall be considered a denial of liability.

To the extent that liability is admitted, payment shall be made within ten business days. Unless otherwise agreed upon in writing by the parties, failure to make the payment within ten business days shall be considered a denial of liability for purposes of this rule. A copy of any such written agreement must be provided to the Exchange.

To the extent that liability is denied, the party making the claim may submit the claim to arbitration in accordance with Rule 622. Such claims must be submitted to the Market Regulation Department within ten business days of the date the party was issued notification that liability was denied.

Claims for losses incurred as a result of trades executed in error at prices within the non-reviewable range may not be submitted for arbitration pursuant to the provisions of Chapter 6.

588.F. Permissible Responses to Phantom Orders

If the GCC has reason to believe that Phantom Orders as defined in Rule 578 have been or are being

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entered into any Exchange system, service or facility, the GCC shall be empowered to take appropriate action to protect the integrity of the market, including, without limitation, suspending trading and/or canceling unfilled orders. The GCC shall also be empowered, in its sole discretion, to cancel transactions, or adjust the trade prices of transactions that were directly or indirectly caused by Phantom Orders, whether or not such transactions were executed at prices outside of the non-reviewable range specified in this Rule.

If Phantom Orders directly cause transactions to be executed on any Exchange system, service or facility and such transactions are not canceled, the GCC shall promptly direct the clearing member carrying positions resulting from such transactions to liquidate the positions in a commercially reasonable manner. Such positions shall be liquidated within 30 minutes of such notification or within 30 minutes of the time the clearing firm knew or should have known that it had been assigned transactions resulting from Phantom Orders, whichever is sooner. The GCC, in its sole discretion, may waive the 30 minute liquidation requirement if it determines that such requirement may have a material, adverse impact on the integrity of the market.

The GCC shall provide notification to the marketplace regarding any action taken or to be taken with respect to the entry of Phantom Orders or execution of a transaction as a result of Phantom Orders, and, in the event transactions are not otherwise canceled or price adjusted by the GCC, any actions required to be taken by clearing members. Such notification(s) shall be made as soon as practicable, but in no event more than 30 minutes after the time that the GCC has accurate information regarding the Phantom Orders that is sufficient to support the necessary notification(s).

Any Exchange, CBOT or NYMEX liability for losses resulting from Phantom Orders shall be subject to the limitations of Rule 578.

588.G. Schedule of Administrative Fees

When GCC cancels or price adjusts a trade, the party responsible for entering the order into the electronic trading system that gave rise to the trade cancellation or price adjustment shall pay an administrative fee to the Exchange in the amount of $1,000 for each such occurrence. If the party is not deemed a Member as defined in Rule 400 and fails to pay the fee, the clearing member through which the trade was placed shall be responsible for payment of the fee. Administrative fees for this Rule are set forth in the Rule 588.H. table.

588.H. Globex Non-Reviewable Trading Ranges

View table here (XLS)

Partner Exchanges

Please access below links for Non-Reviewable Ranges for our Partner Exchange contracts.

BMD - http://www.bursamalaysia.com/market/derivatives/trading/trading-parameters/

DME - http://www.dubaimerc.com/no-bust-ranges

589. SPECIAL PRICE FLUCTUATION LIMITS

The special price fluctuation limits, including dynamic price fluctuation limits, applicable to those contracts with such limits are set forth in the Special Price Fluctuation Limits and Daily Price Limits Table ("Table") in the Interpretations Section at the end of Chapter 5.

589.A. Initial Price Fluctuation Limits for All Contract Months

At the commencement of each trading day, there shall be initial price fluctuation limits in effect for each futures contract month of the primary futures contract (as identified in the Table) above or below the previous day's settlement price for such contract month set at the first special price fluctuation limit level as provided in the Table.

589.B. Triggering Events and Temporary Trading Halts

1. First Triggering Event and Temporary Trading Halt

If the lead contract month (as identified by the Exchange) of the primary futures contract is bid or offered via Globex at the upper or lower price fluctuation limit at the first special price fluctuation limit level, as applicable, it will be considered a triggering event that will begin a two (2) minute monitoring period in the lead contract month. If, at the end of the two (2) minute monitoring period, the lead contract month of the primary futures contract is not bid or offered at the applicable special price fluctuation limit, the special price fluctuation limits shall be expanded an additional increment above and below the previous day's settlement price for all contract months of the primary futures contract and all contract months of associated products of the primary futures contract as provided in the Table.

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If, however, at the end of the two (2) minute monitoring period, the lead contract month of the primary futures contract is bid or offered at the applicable special price fluctuation limit, a two (2) minute temporary trading halt will commence in all contract months of the primary futures contract and in all contract months of associated products of the primary futures contract as provided in the Table. In addition, trading in any associated product that is an option related to the primary futures contract or in an option contract related to any other associated product of the primary futures contract that may be available for trading on Globex or on the trading floor shall be subject to a coordinated temporary trading halt.

2. Expansion of Limits Following Temporary Trading Halt

Following the end of a temporary trading halt, the affected markets shall re-open simultaneously in all contract months of the primary futures contract and in all contract months of associated products of the primary futures contract. When trading resumes, the special price fluctuation limits shall be expanded an additional increment above and below the previous day's settlement price for all contract months of the primary futures contract and all contract months of associated products of the primary futures contract as provided in the Table.

In each instance in which a triggering event occurs, a two (2) minute monitoring period will commence as provided in Section B.1. of this Rule. In each instance, the special price fluctuation limits shall be expanded by an additional increment above and below the previous day's settlement price for all contract months of the primary futures contract and all contract months of associated products of the primary futures contract as provided in the Table. Following the fourth triggering event on a trading day, there shall be no further special price fluctuation limits.

589.C. Price Fluctuation Limits on Trading Floor (Floor Trading)

The special price fluctuation limits cited in Section A. of this Rule shall be applicable to all products in the Table that are traded via open outcry on the trading floor. Trades occurring via open outcry on the trading floor shall not constitute a triggering event for purposes of a temporary trading halt.

In all instances in which a temporary trading halt in the lead contract month of the primary futures contract occurs on Globex, floor trading in all contract months in any option related to the primary futures contract or in an option contract related to any associated product of the primary futures contract shall be subject to a coordinated temporary trading halt.

Whenever Globex markets are re-opened with expanded price limits pursuant to the provisions of Section B. of this Rule, the affected markets on the trading floor shall simultaneously re-open with expanded price limits.

589.D. Dynamic Price Fluctuation Limits

At the commencement of each trading day, the subject contracts, as designated in the Table, shall be assigned a price limit variant which shall equal a percentage of the prior trading day's Exchange-determined settlement price, or a price deemed appropriate by the GCC, ("dynamic variant"). During the trading day, the dynamic variant shall be applied in rolling 60-minute look-back periods to establish dynamic lower and upper price fluctuation limits as follows:

(a) the dynamic variant shall be subtracted from the highest trade and/or bid price during a look-back period to establish the lower price fluctuation limit, i.e., trade and/or offer, and

(b) the dynamic variant shall be added to the lowest trade and/or offer price during a look-back period to establish the upper price fluctuation limit, i.e., trade and/or bid. 1. Triggering Events and Temporary Trading Halts

If the lead contract month (as identified by the Exchange) of the primary futures contract is traded, bid or offered on Globex at a price below the lower or above the upper dynamic price fluctuation limit, it shall be considered a triggering event which shall begin a two (2) minute temporary trading halt in all contract months of the primary futures contract and in all contract months of associated products of the primary futures contract as provided in the Table. If a non-lead contract month of the primary futures contract is traded, bid or offered on Globex at a price below the lower or above the upper dynamic price fluctuation limit, it shall be considered a triggering event which shall begin a two (2) minute temporary trading halt in that non-lead contract month of the primary futures contract.

2. Limits Following Temporary Trading Halt

Following the end of a temporary trading halt triggered by the lead contract month, the affected markets shall re-open simultaneously at the indicative opening price as determined by the Exchange in all contract months of the primary futures contract and in all contract months of the associated contracts of the primary futures contract as provided in the Table. When trading resumes, the

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dynamic lower and upper price fluctuation limits shall be recalculated as described above. Following the end of a temporary trading halt triggered by a non-lead contract month, the affected market shall re-open at the indicative opening price as determined by the Exchange and the dynamic lower and upper price fluctuation limits shall be recalculated as described above.

3. Additional Characteristics

On each trading day, should there be a triggering event in the lead contract month of the primary futures contract during such contract's settlement determination period, there shall be a (5) five second temporary trading halt in all contract months of the primary futures contract and in all contract months of associated products of the primary futures contract as provided in the Table. If a non-lead contract month of the primary futures contract, or any contract month of an associated product of the primary futures contract, experiences a triggering event during the primary futures contract's settlement determination period, there shall be a (5) five second temporary trading halt for that non-lead contract month or that contract month of an associated product of the primary contract.

Should there be a triggering event during the final settlement determination period in an expiring futures contract, there shall be a (5) five second temporary trading halt in that contract month.

On each trading day, should there be a triggering event in the lead contract month of the primary futures contract during the (2) two-minute period preceding the close of trading, there shall be a (5) five second temporary trading halt in all contract months of the primary futures contract and in all contract months of associated products of the primary futures contract as provided in the Table. If a non-lead contract month of the primary futures contract, or any contract month of an associated product of the primary futures contract, experiences a triggering event during the (2) two-minute period preceding the close of trading of the primary futures contract, there shall be a (5) five second temporary trading halt for that non-lead contract month or that contract month of an associated product of the primary contract.

POSITION LIMIT, POSITION ACCOUNTABILITY AND REPORTABLE LEVEL TABLE

View table here (XLS)

SPECIAL PRICE FLUCTUATION LIMITS AND DAILY PRICE LIMITS TABLE

View table here (XLS)

TRADING AT SETTLEMENT ("TAS"), BASIS TRADE AT INDEX CLOSE ("BTIC"), BASIS TRADE AT CASH OPEN ("TACO") AND TRADE MARKER AT CLOSE ("TMAC") TABLE

View table here (XLS)

RULE 539.C. CROSSING PROTOCOLS TABLE

View table here (XLS)

INTERPRETATIONS & SPECIAL NOTICES RELATING TO CHAPTER 5

ACCESS, CONDUCT AND APPEARANCE CODE

It is imperative that persons who utilize the Exchange Trading Floors ("trading floor") maintain a proper and businesslike atmosphere on the trading floor. This is not only for the benefit of the thousands of visitors (ranging from U.S. government officials to foreign dignitaries to the general public) who come to the Exchange each year, but also to maintain and enhance the reputation and dignity of the Exchange as an international marketplace.

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Accordingly, the Exchange has established rules governing access to and conduct on the trading floor as well as standards of appearance. These rules and standards apply to members and their employees, member firm employees, Exchange employees and visitors.

I. Access

A. To gain access to the trading floor, every member, member's employee, member firm employee, and Exchange employee must use only their own personal access card to gain access to the trading floor. Exchange trading floor employees, other Exchange employees routinely on the trading floor and members must display their personal access card or their Exchange issued identification badge. Non-member employees of members and member firms must display their personal access cards on the upper front of their jackets with the picture side facing outward. Broker assistants must also wear a badge provided by the Exchange that identifies them as broker assistants.

B. Members are required to register and accompany their visitors and are responsible for their actions while they are on the trading floor. Visitors must wear appropriate attire that is clean and presentable and are not allowed in any pit during trading hours. Visitors' overcoats, packages, umbrellas or briefcases are not permitted on the trading floor.

C. All visits by public figures to CME Group trading floors, offices and common areas must be approved and coordinated, in advance, by CME Group's Public Affairs or Government Relations Department. Public figures include government officials and representatives, domestic and foreign dignitaries, politicians, celebrities, business leaders and all other high-profile individuals.

D. Members may not request trading floor access privileges for the same visitor on more than three days of the same calendar month without the permission of designated Exchange staff of the Security Department.

E. Visitors are prohibited from soliciting employment or from acting as employees of members, member firms or the Exchange on the trading floor.

F. No one under the age of 16 will be admitted to the trading floor during trading hours.

II. Conduct

Commonly accepted standards of propriety and decorum apply to everyone on the trading floor. The following behavior, speech or actions are expressly prohibited on the trading floor.

A. Possessing any weapon (including, but not limited to, firearms, knives, stun guns or pepper spray);

B. Carrying or consuming food or drink. Individually-wrapped (non-chocolate) hard candy and gum, however, are permissible.

C. Reckless throwing of trading cards or any other material;

D. Excessive speed in moving around the trading floor;

E. Use of emergency exits without proper justification;

F. Smoking or use of tobacco products, including chewing tobacco;

G. Use of members-only facilities by non-members;

H. Failure to give member priority to quotation machines, news tickers, monitors and other facilities where such member priority is so designated;

I. Engaging in any activity that is disruptive to trading;

J. The sale or solicitation of goods or services without consent of the Exchange;

K. Having outer coats or umbrellas on the trading floor;

L. Use of cameras or video equipment, unless authorized by the Exchange. Flash photography, however, is never permitted.

In addition, the following activities are prohibited anywhere on Exchange premises:

M. Any behavior, speech or actions that are detrimental to the interests and good name of the Exchange (this includes any conduct which is a violation of any local, state or federal law);

N. Profanity, vulgarity (including wearing buttons with crude or offensive slogans or pictures) or any speech or action that tends to intimidate, degrade or endanger others;

O. Defacing or otherwise damaging: 1) an Exchange-issued badge or jacket; 2) Exchange facilities or property; or 3) any facility or property regardless of ownership;

P. Possessing a firearm or other weapon;

Q. Discarding refuse on escalators or in elevators or in hallways or lobbies; and

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R. Harassment related to race/color, sex/gender, sexual orientation, age, religion, veteran status, national origin and disability/medical condition is expressly prohibited.

III. Appearance

A. All apparel should be neat, clean, presentable and in keeping with the businesslike atmosphere of the trading floor.

B. Jackets: Where required, every member, member's employee, member firm employee and Exchange trading floor employee must wear a jacket provided by the Exchange or their employer, or, in the case of members, a jacket of their own choosing. All jackets must conform to Exchange standards. Guests may not wear trading jackets on the trading floor during trading hours.

C. Shirts: All men must wear shirts with a collar suitable for a necktie or bow tie. Shirts must be buttoned to at least the second button from the collar. Golf-type shirts are permitted. Shirttails must be tucked in. Turtleneck sweaters are not allowed for men. Crewneck sweaters are allowed if a conventional collar suitable for a necktie or bow tie is visible. Sweatshirts, tie-dye shirts and T-shirts are prohibited.

D. Shoes: Shoes must be clean, safe and not torn or frayed. The following footwear is specifically prohibited: all shoes without backs, canvas slippers, moccasins, rubber boots, rubber overshoes, clogs, bedroom slippers, and shoes with platforms over 2 inches. All shoes must be tied with laces or appropriately fastened.

E. Pants: The following pants are specifically prohibited: blue jeans, shorts and sweat pants. Tight-fitting stretch pants are allowed only when worn with blouse or shirt at mid-thigh or lower.

F. Skirts and dresses: Skirts and dresses must reach mid-thigh or lower.

G. Headwear: All headgear or head coverings are prohibited, except for religious or medical reasons.

H. Miscellaneous: The following are specifically prohibited: sunglasses, ornaments, pendants or similar items that are distracting or unbusinesslike. Clothing or accessories that draw unusual attention will be deemed unbusinesslike and not permitted on the trading floor.

IV. Drug and Alcohol Abuse

In order to maintain a safe, healthful, and productive working environment, the Exchange has established the following policy prohibiting drug and alcohol use on Exchange premises.

The following activities are prohibited and may result in disciplinary action, including immediate and permanent bar of access to Exchange premises:

A. Possession of open containers or use of alcohol, except as expressly authorized by the Exchange.

B. Being under the influence of alcohol on Exchange premises.

C. Use, sale, purchase, transfer, or possession of any illegal drug on Exchange premises.

D. Failure on the part of non-members to submit to a reasonable search by authorized Exchange personnel of lunch boxes, bags, parcels, packages, purses, briefcases, pockets or coats, etc.

Members and Member Firms are responsible for their employees' strict adherence to these requirements.

QUOTATION CHANGES

I. GENERAL PROCEDURES

A. Corrections requested up to 15 minutes from the time the bid, offer or trade occurred or reportedly occurred: Changes must be authorized by a member of the Pit Committee or an Exchange Official.

B. Corrections requested more than 15 minutes from the time the bid, offer or trade occurred or reportedly occurred: Changes must be authorized by:

1. 15-30 Minutes: A member of the Pit Committee and one Exchange Official.
2. Over 30 Minutes: A member of the Pit Committee, a member of the Floor Conduct Committee and a Senior Exchange Official.

C. Unanimous Approval Required: Unanimous approval among the individuals participating in the quote change consideration is required to effectuate the requested change. In the absence of unanimity, the proposed quote adjustment shall not be made.

D. A request for a quote change which results in a new high or low for the day must be made within 5 minutes (futures) or 10 minutes (options) of the time the bid, offer or trade occurred or reportedly occurred.

A request for a quote change which affects an established opening range must be made within 15

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minutes after the posting of the range, or, in the case of a request for a quote change which affects an established closing range, within 10 minutes of the posting of the closing range. Such requests shall be considered by a member of the Pit Committee, a Floor Conduct Committee member and a Senior Exchange Official. Failure to make such a timely request will bar consideration of the quote change. The time limitations described in this Section D will not apply in the case of options strikes or futures contracts deemed by a Senior Exchange Official to be inactive or illiquid or in the case of a fast market designation. These requests may be considered by a member of the Pit Committee, a Floor Conduct Committee member and a Senior Exchange Official at any time during the same day's trading session.

E A decision to adjust a quote must be made within 15 minutes after a quote change request has been made. However, in the event a fast market has been declared while the quote adjustment is under consideration, the period for consideration may continue for 15 minutes after the end of the fast market. To the extent practicable, quote change adjustments shall be announced to the pit.

F. Reconsideration: Once a request for a particular quote change has been resolved, or if no decision is reached within the allotted time pursuant to paragraph 5 above, a subsequent request for reconsideration involving the original quote or adjustment may be considered if a Senior Exchange Official deems that new relevant information pertaining to the original request is now available. Such request for reconsideration must be considered by the same individuals who ruled on, or failed to reach a timely resolution of, the original request. In the event one or more of the individuals who participated in the consideration of the original quote change request is unavailable to consider the request for reconsideration, a Senior Exchange Official shall designate a substitute. However, this reconsideration process may not be utilized for a correction involving a quote change which results in a new high or low for the day, with the exception of option strikes or futures contracts deemed by a Senior Exchange Official to be inactive or illiquid, or in declared fast markets.

G. Requests for Next Day Corrections

If an outright options or options spread or combination quote has been inadvertently omitted from the price reporting system and such omission is not discovered until after the trading session, trades may be allowed to clear at the omitted price at any time prior to the opening of the affected market the next day, provided that all of the following requirements are satisfied:

1. The parties to the trade can reasonably show that they properly reported the trade price and had a reasonable basis for believing that the trade price would be posted;
2. The parties to the trade produce documentation of: a) the contemporaneous recordation of the trade; b) the confirmation of the trade to the customer of the member firm representing the order; and c) the submission of the trade to the Exchange Clearing House and its failure to clear the trade due to a price edit;
3. The change is authorized by a Senior Exchange Official; and
4. The change is documented pursuant to Section II.B below.

II. DOCUMENTATION NEEDED FOR QUOTATION CHANGES

A. In the case of quote changes requested pursuant to Section I.A., a record shall be made of all committee members or Exchange employees approving the quote change and the change will be recorded on Time and Sales.

B. In the case of quote changes requested pursuant to Section I.B.1., a hard copy record of the quote change shall be made by Exchange staff. The individuals approving the change shall promptly sign the record. The record shall be time-stamped upon request and again upon approval and shall include the reason for the change, and, in the case of a quote change requested pursuant to Section I.B.2., the reason for the delay. For all approved quotation changes other than next day corrections pursuant to Section I.G above, the quotation change will be recorded on Time and Sales.

III. CONFLICTS OF INTEREST

No individual may authorize any quotation change, insertion or cancellation if such individual has a personal or financial interest in such change, insertion or cancellation.

IV. AUTHORITY OF SENIOR EXCHANGE OFFICIALS WITH RESPECT TO QUOTATION CHANGES

Senior Exchange Officials may review and authorize any request for a quotation change in circumstances where the individuals specified in Sections I and II are otherwise not available or where the change is not encompassed by Section I or II. Notwithstanding the procedures set forth in Sections I and II, Senior Exchange Officials are empowered to authorize or deny any requested change only in circumstances where such action is necessary to ensure the integrity or promote the orderly functioning of the market.

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Such decisions by Senior Exchange Officials shall be documented and signed by the Senior Exchange Official and except for next day corrections pursuant to Section I.G above, the quotation change will be recorded on Time and Sales.

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CHAPTER 6
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Chapter 6
Arbitration

JURISDICTION

600. DISPUTES SUBJECT TO CME ARBITRATION

600.A. Disputes Among Members

It is contrary to the objectives and policy of the Exchange for members to litigate certain Exchange-related disputes. Disputes between and among members that are described below and that are based upon facts and circumstances that occurred at a time when the parties were members shall be subject to mandatory arbitration in accordance with the rules of this Chapter:

1. claims between members that relate to or arise out of any transaction on or subject to the rules of the Exchange;
2. claims between or among members relating to ownership of, or interests in, trading rights on the Exchange; and
3. claims between members relating to the enforceability of:
   a. non-compete clauses to the extent they relate to the Exchange,
   b. terms of employment on the trading floor, and
   c. financial arrangements relating to the resolution of error trades in Exchange products that are included in any employment agreement.

Nothing in this rule, however, shall require a member employee to submit to arbitration any claim that includes allegations of a violation of federal, state or local employment discrimination, wage payment or benefits laws.

600.B. Disputes Between Members and Certain Non-Member Employees

The enforceability of the following provisions of an employment agreement entered into on or after August 1, 1998, between a member and a non-member employee registered pursuant to Rule 501 shall be subject to mandatory arbitration in accordance with the rules of this Chapter:

1. non-compete clauses to the extent that they relate to the Exchange; and
2. terms of employment on the trading floor.

Nothing in this rule, however, shall require a non-member employee to submit to arbitration any claim that includes allegations of a violation of federal, state or local employment discrimination, wage payment or benefits laws. A non-member employee shall mean a member's bona fide employee who has been registered by the Exchange to work on the trading floor.

600.C. Claims Against the Exchange

Claims against the Exchange pursuant to the provisions of Rule 578.C., Rule 578.D., Rule 578.F., and/or Rule 579.C. shall be subject to mandatory arbitration in accordance with the rules of this Chapter, provided the claimant has complied with all pre-filing requirements under the applicable rule(s).

600.D. Permissive Arbitrations

The following may be submitted for arbitration at the Exchange and, in the event such a claim is submitted against a member, that member is required to arbitrate the dispute under these rules, unless otherwise provided:

1. claims of a customer against a member that relate to or arise out of any transaction on or subject to the rules of the Exchange;
2. claims against an Exchange clearing member and its Globex user pursuant to Rule 588.E., provided that any non-member Globex user has consented to arbitration of the dispute at the Exchange within 21 days of receipt of a claim;
3. claims of a customer against a clearing member responsible for the spot-call delivery performance of a transaction on or subject to the rules of the Exchange and/or against a member in connection with such a transaction;
4. claims of an SGX member against a member that relate to or arise out of transactions

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subject to or relating to the Mutual Offset System;

5. claims of a non-member (other than those claims required to be arbitrated under Rule 600.B) against a member that relate to or arise out of employment on the trading floor;
6. claims by or against an entity whose majority ownership is held by Exchange members and whose principal business relates to activity on or at the Exchange, where the dispute has a material connection to the business or purpose of the Exchange, provided such entity has consented to arbitration of the dispute at the Exchange within 20 days of receipt of a claim; and
7. at the discretion of the Chief Regulatory Officer, any claim involving the interests of the Exchange, its members, their business relations or commodity futures or swaps trading in general not otherwise arbitrable under these rules, provided the parties have consented to such arbitration.

600.E. Waiver of Any Objection to Jurisdiction

Any member or non-member who submits a claim or grievance to arbitration or any member who appeals to a hearing committee of the Board from any panel decision, or who takes any steps therein, shall be conclusively presumed to have voluntarily recognized and agreed to the jurisdiction of the panel or hearing committee of the Board to hear and determine the claim or appeal.

600.F. Hearing Panel

Any claim involving only members shall be heard by a Member panel and its decision shall be rendered in accordance with the rules of this Chapter. A Member panel shall mean an arbitration panel consisting of a co-chairman of the Arbitration Committee and five Members as defined in Rule 400.

601. CUSTOMER CLAIMS AGAINST MEMBERS

601.A. Definitions

1. Customer. Customer shall mean any person, not a member of the Exchange, who places an order or for whose account an order is placed for execution on the Exchange or who otherwise executes a transaction on or subject to the rules of the Exchange.
2. Claim. Claim shall mean any dispute arising out of any transaction on or subject to the rules of the Exchange, including mutual offset rules.
3. Mixed Panel. Mixed Panel shall mean an arbitration panel consisting of a co-chairman of the Arbitration Committee and five Arbitration Committee members, three of whom shall be persons who are non-members and who are not associated with any member of a contract market, or employee thereof, and are not otherwise associated with a contract market.
4. Member. Member as used in this Chapter shall mean 1) members and clearing members of the Exchange, including retired members with floor access privileges and individuals and entities described in Rule 106; 2) associated persons (“APs”) and affiliates of clearing members and member firms of the Exchange; 3) guaranteed introducing brokers of clearing members and member firms of the Exchange and their APs; 4) Exchange permit holders; 5) regular firms; and 6) individuals and entities that have agreed in writing to comply with the rules of the Exchange.
5. Punitive Damages. Punitive damages shall mean an award in excess of actual damages suffered. Punitive damages shall be limited to twice the amount of actual damages and may be awarded only to a customer after a determination that there has been willful and wanton misconduct in the execution or handling of an order by a member or an employee acting on behalf of a member.

601.B. Refusal to Hear Certain Disputes

A chairman may, but shall not be required to, order that a dispute that is otherwise arbitrable under these rules not be arbitrated hereunder if the dispute requires for adjudication the presence of essential witnesses or third parties over whom the Exchange has no jurisdiction or who are not otherwise available, or if the dispute requires the application of the rules of another exchange.

601.C. Initiation of Arbitration

In the event that a complaint is received by the Exchange from a customer, it shall be referred

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to the Market Regulation Department, which shall inform the customer of alternative dispute settlement forums and, when appropriate, forward to the customer a Consent Form for arbitration at the Exchange. Such form shall inform the customer, by attachment of all pertinent rules, of the customer's rights and liabilities, including costs associated with arbitration, and the option of selecting an arbitration panel consisting of Exchange members or a Mixed Panel to decide the claim and any counterclaims, cross-claims or third-party claims.

A customer who submits a claim for arbitration in accordance with these rules consents thereby to the jurisdiction of the arbitrators and agrees to the arbitration of any counterclaims, cross-claims or third-party claims by any respondent which arise out of the transaction that is the subject of the customer's claim. The claim shall comply with the requirements of Rule 602, and in the case of a request for punitive damages, the claim shall set forth the facts the customer intends to present in support of the claim that the misconduct was willful and wanton.

The customer shall file a completed Consent Form and deposit the arbitration fee with the Market Regulation Department. Notice shall then be given to the member against whom the claim is asserted, who shall respond to the claim in accordance with Rule 603.

601.D. Referral to Arbitration Panel or Mixed Panel

A Customer claim against a member shall be heard by the type of panel selected by the customer and its decision shall be rendered in accordance with the rules of this Chapter. Customer claims (and any counterclaims, cross-claims or third-party claims applicable thereto) that do not exceed $5,000 and do not include any claim for punitive damages may, in the interests of efficiency and economy, be resolved without hearing. The panel shall render its decision based upon the parties' written submissions and any other relevant information obtained and provided to the panel and the parties at the direction of the chairman and/or the panel.

FILING PROCEDURES

602. INITIATING AN ARBITRATION CLAIM

A claimant may initiate a claim by submitting a written description of the dispute, a completed Arbitration Cover Sheet and depositing the appropriate arbitration fee with the Market Regulation Department within the period of eligibility for arbitration claims. The written claim shall include a clear description of the facts and circumstances involved in the dispute, including the transaction(s) or agreement(s) complained of, the names of the persons and firms alleged to be responsible for any loss to the claimant, the dates of all acts or omissions relevant to the claim, a detailed calculation of the amount claimed and any other information necessary to fully describe the dispute.

The Market Regulation Department shall reject for filing any claim that does not fully describe the dispute, is clearly filed after the period of eligibility has expired or is clearly not arbitrable at the Exchange. Such a claim will be promptly returned to the filing party with a notice describing the deficiency. A claimant seeking to correct the deficiency and file an amended claim may do so within 30 days of receiving notice describing the deficiency despite any expiration of the period of eligibility prescribed by Rule 609 during that 30-day period. The acceptance for filing by the Market Regulation Department shall not preclude a challenge to the arbitrability of the claim nor create a presumption that the claim is arbitrable.

603. ANSWERING AN ARBITRATION CLAIM

Each respondent shall file a written response within 21 days after receipt of the written claim. However, if a party has timely filed a challenge to the arbitrability of the dispute, its response shall be due 21 days after receipt of the written decision confirming the arbitrability of the dispute.

The written answer must admit the claim or describe the respondent's basis for denying liability to the claimant(s). The answer may include an admission or denial of each specific allegation contained in the claim and/or the respondent's narrative description of the facts and circumstances involved in the dispute. A respondent may assert in an answer any defense that would be available in a court of law or equity, including any affirmative defense.

604. FAILURE TO ANSWER

A respondent's unexcused failure to file a timely answer shall constitute an admission of the

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facts alleged in a claim.

605. COUNTERCLAIMS, CROSS-CLAIMS AND THIRD-PARTY CLAIMS

A respondent may assert any counterclaim, cross-claim and/or third-party claim to the extent such claim would be allowable as an original claim under these rules and, in response to claims by a customer against a member, the member may assert any counterclaim, cross-claim and/or third-party claim arising out of the same transaction or incident that is the subject of the customer's claim. Each respondent must file any counterclaim, cross-claim or third-party claim at the same time an answer to a claim is due. Initiating counterclaims, cross-claims, third-party claims and answers thereto shall conform to the requirements for initiating and answering original claims.

A respondent who believes that another member may have a claim to any money or property which is the subject of a dispute in arbitration and that the failure of that other member to assert a claim in the pending arbitration could prejudice the interests of the respondent may submit a request to the chairman to compel the participation of the other member. If a member fails to file such claim after being ordered to assert that claim in the pending arbitration, then notwithstanding any other rule, that member shall be barred from asserting in the future any claim against the respondent that is based on the same transaction, occurrence or subject.

606. REVIEW OF ARBITRABILITY

Any party may file a challenge to the arbitrability of a dispute submitted for arbitration at the Exchange. A party's failure to file a timely challenge to arbitrability shall waive any right to object thereafter to the arbitrability of the dispute.

A challenge to arbitrability by a claimant must be filed no later than 5 days after the claim is submitted for arbitration. A challenge to arbitrability by a respondent must be filed no later than 10 days after the respondent has received notice of the claim. The request must be in writing and state the reasons why the dispute is not arbitrable at the Exchange. Any other party may file a written response in support of or opposition to the challenge no later than 10 days after receiving notice of the challenge to arbitrability.

The chairman may decide the arbitrability of a dispute based on their consideration of the written submissions of the parties. The chairman's decision shall be final and is not appealable.

607. CONSOLIDATION OF ARBITRATION DISPUTES

If a chairman receives notice that two or more arbitration disputes pending at the Exchange are related, the chairman may order that any or all of the disputes be consolidated for purposes of conducting a hearing on the disputes. In determining whether to consolidate the disputes the chairman may consider the efficiencies of consolidation as well as the burdens and benefits to the parties in consolidating the disputes.

608. WITHDRAWAL OF CLAIMS

A. A party may voluntarily withdraw its claim, counterclaim, cross-claim or third-party claim without prejudice at any time before an answer thereto has been filed by notifying the Market Regulation Department in writing of such withdrawal.

B. After an answer to any claim, counterclaim, cross-claim or third-party claim has been filed, the claimant seeking to withdraw the claim, counterclaim, cross-claim or third-party claim must submit to the chairman a written request to withdraw with prejudice or upon such terms and conditions as may be imposed by the chairman.

C. A withdrawal with prejudice under this rule shall bar the claimant from re-filing any claim based on the same acts, transactions or omissions as the dismissed claim.

609. PERIOD OF ELIGIBILITY FOR ARBITRATION

An arbitration must be initiated within two years of the date the claimant knew or should have known of the dispute on which the claim is based, except that claims filed pursuant to Rule 600.C. must be submitted within 10 days of receiving notice that the Exchange has refused to compensate the claimant for the claimed loss.

Counterclaims, cross-claims and third-party claims must be submitted no later than the date on which the answer is due.

610. PARALLEL PROCEEDINGS

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No claim will be accepted for arbitration at the Exchange if the Market Regulation Department receives notice that another arbitration, reparations action or civil court proceeding based on the same act, transaction or omission as the arbitration claim is pending at the time of filing.

No claim, counterclaim, cross-claim or third party-claim will be accepted for arbitration against a respondent if the Market Regulation Department has received notice that a stay exists due to the pendency of any bankruptcy proceeding against that respondent. If such a stay arises after a claim is accepted for arbitration or if the Market Regulation Department subsequently learns that such a stay is pending, the claim shall be dismissed without prejudice as to each respondent who is the subject of the stay. Nothing in this rule shall prevent a claim in arbitration from proceeding against any remaining respondent.

PRE-HEARING PROCEDURES

611. REQUESTS FOR DOCUMENTS, INFORMATION OR TESTIMONY

A. The initial schedule for document requests by parties and responses will be set by the Market Regulation Department. The chairman may require any member, or any person employed by or associated with a member to produce relevant documents in their possession or control at any time after a claim has been filed.

Upon the failure of a party or member to voluntarily produce relevant documents in its possession or control upon request by a party, the party seeking the documents may submit a written request to the chairman for an order compelling the production of such documents.

1. Any request for an order compelling production of documents must:
   a. identify each document or type of document sought with as much specificity as possible;
   b. explain the relevance of each document or type of document sought; and
   c. include a representation that the requesting party has attempted to obtain the documents from the responding party before resorting to a request to the chairman.
2. The party or member against whom an order compelling production is sought shall:
   a. produce copies of the requested documents to the requesting party and the Exchange; or
   b. represent in writing that the documents are not in their possession or control and explain the basis for such representation, and, if applicable, identify who is in possession or control of the requested documents; or
   c. object in writing to a request and provide the basis for each objection.

B. In connection with any claim, counterclaim, cross-claim or third-party claim that seeks relief in excess of $50,000, any party may seek leave from the chairman to serve written requests for information on any other party. The chairman shall have discretion to determine whether and under what circumstances such requests may be permitted.

C. The chairman may require any member, or any person employed by or associated with a member, to appear and to testify at a hearing.

D. Whenever such production or appearance results from the request of a party, all reasonable costs and expenses incurred shall be borne by the party making the request, unless directed otherwise by the panel. A party who incurs costs and expenses recoverable under this rule may, no later than the close of the last hearing date in the matter, submit an application to the panel for such costs and expenses. Such application shall contain a detailed explanation of amounts claimed. The panel may grant or deny all or any portion of the application.

E. Any member or employee thereof failing to appear, testify, produce documents or provide information in accordance with this rule may be charged with a violation of Rule 432.

612. DOCUMENTS AND WITNESSES TO BE PRESENTED AT HEARING

No later than 10 business days prior to the first scheduled hearing, each party must provide every other party and the Exchange with copies of all documents that the party intends to offer into evidence and a list of the names of all witnesses, including party-witnesses, who the party

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intends to call at the hearing in support of a claim or defense. Parties are not required under this rule to provide copies of those documents that they may use, or to identify any witnesses whom they may call, only in cross-examination or rebuttal.

613. ADDITIONAL PROCEDURES

The chairman may establish any procedures not otherwise contemplated by these rules necessary to establish a just, equitable and efficient method of resolving a particular dispute, except that the chairman may not decide a motion to dismiss a claim, as motions to dismiss are not permitted under these rules.

HEARINGS

614. ARBITRATION PANEL

614.A. Appointment of Arbitration Panel

The Market Regulation Department shall select a panel of arbitrators from the Exchange's Arbitration Committee to hear and decide a dispute. The panel shall consist of five arbitrators and one chairman.

614.B. Requests to Remove an Arbitrator

1. Each party may request the removal of any arbitrator(s) from a panel for good cause shown. Such request must be made no later than the start of testimony at the first scheduled hearing. Failure of a party to timely request the removal of any arbitrator(s) will be deemed a waiver of that party's right to any further objection to the arbitrator's participation in the hearing and decision of the dispute.
2. The chairman, after considering a request to remove an arbitrator, another party's objections thereto and/or the statements of an arbitrator whose removal is sought, may deny the request or excuse the arbitrator. The chairman's decision shall be final and may not be appealed.
3. If an arbitrator is excused prior to the date of the first scheduled hearing, the Market Regulation Department shall select another Arbitration Committee member to replace the excused arbitrator at the hearing. Parties may make any appropriate request for the removal of the replacement arbitrator under this rule.
4. If an arbitrator is excused on or after the date of the first scheduled hearing, the dispute may, at the election of the non-requesting party and with the consent of the chairman be heard and decided by the remaining arbitrators.

615. HEARING PROCEDURES

615.A. Chairman

The panel chairman shall preside over the proceeding and shall make such determinations on relevancy and procedure as will promote a fair and expeditious adjudication of any claim. The chairman may administer oaths or affirmations by witnesses. Upon request of the panel chairman, the Market Regulation Department shall submit any documents to the panel and parties in the Exchange's possession that are relevant and readily available.

615.B. Arbitrators

The arbitration panel shall consider all relevant, probative testimony and documents submitted by the parties. The panel shall be the sole judge of the law and the facts, but if the panel is in doubt as to any questions of law, it may refer the question to Exchange legal counsel for an opinion. The panel shall not be bound by the formal rules of evidence. The final decision of the panel shall be by majority vote of the arbitrators, and the chairman shall vote only to resolve a tie.

615.C. Parties and their Representatives

Each party and their representative has the right to examine all relevant documents prior to and during the hearing, to present all relevant evidence in support of a claim or defense or as rebuttal to a claim or defense, and to question during the hearing witnesses presented in connection with a claim or defense. An entity may have one corporate representative of the entity, in addition to any counsel of record, attend the arbitration hearing. Such corporate representative will not be precluded from testifying in the matter.

615.D. Witnesses

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All testimony offered to the panel will be under oath or affirmation. Witnesses will be permitted in the hearing room only while providing testimony to the panel. Witnesses shall testify in person at the hearing, except that for good cause shown and in the discretion of the chairman, a witness may be allowed to testify by telephone or other appropriate means.

615.E. Hearing Record

An audio recording of the proceeding shall be made by the Market Regulation Department. Unless otherwise ordered by a chairman of the Arbitration Committee, Business Conduct Committee or a duly appointed Hearing Panel of the Board of Directors, a copy of the audio recording will be released to a party only for the purpose of perfecting an appeal of a decision rendered by a Panel or upon application to confirm, vacate, modify or correct an award in a court of law. The requesting party shall bear the cost of copying the recording.

DECISIONS

616. AWARDS

616.A. Decision by Panel

After a hearing, or, on customer claims that do not exceed $5,000 upon consideration of the pleadings and other relevant information, the arbitration panel shall issue a written decision signed by the panel chairman and at least a majority of the panel. The panel may decide any matter in controversy and issue any order the panel deems necessary to fully resolve the dispute. The Market Regulation Department shall promptly serve copies on all parties. A monetary award made by the panel may include the following:

1. actual damages;
2. interest thereon;
3. punitive damages of no more than two times the amount of actual damages in accordance with Rule 601.A.5.;
4. the arbitration fee incurred by a prevailing party, or a portion thereof; and
5. all or any portion of the administrative costs of the proceeding and any other reasonable and necessary expenses, including, but not limited to, attorneys' fees (a) incurred by a party by reason of another party's frivolous or bad faith claim, defense, or conduct during the arbitration or (b) where a statutory or contractual basis exists for awarding such fees. Requests for attorneys' fees and costs incurred in the arbitration proceeding must be raised in the proceeding or they are waived.

616.B. Decision by the Chairman

The chairman may order a party who fails to prosecute or defend a claim to pay to the Exchange all or a portion of its administrative costs incurred in connection with the arbitration claim.

616.C. Limitations on Monetary Awards

Monetary awards in claims filed pursuant to Rule 621 shall be limited as set forth in Rule 578.

617. CORRECTION OF AWARD

Any party may, within three days after receipt of the notice of decision, request the arbitration panel to modify or correct its decision where there has been an obvious material miscalculation or misdescription or where the notice is imperfect in a matter of form not affecting the merits of the dispute or decision.

618. SATISFACTION OF AWARD

A party directed to pay an award shall submit payment of the amount due directly to the party receiving the award. An arbitration award must be satisfied within 15 days of receipt of the notice of decision. If a request is made to correct an award pursuant to Rule 617, the award must be satisfied within 15 days of receipt of the corrected notice of decision.

A party making payment must submit proof of payment to the Market Regulation Department no later than the business day following payment. An individual member who fails to provide proof of payment within the time prescribed will forfeit the following privileges until proof of payment has been provided: 1) access to all CME Group markets; 2) access to the Globex platform; and 3) access to any other electronic trading or clearing platform owned or controlled by CME Group. An entity member that fails to provide proof of payment within the time

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prescribed will forfeit preferred fee treatment for its proprietary trading. Any member that fails to pay an arbitration award within the time prescribed may be subject to sanctions pursuant to Rule 432.R and may be immediately removed from any trading floor or facility owned or controlled by CME Group.

APPEALS

619. APPEALS

Any decision rendered in a dispute among members resulting in a non-cash award or involving a claim, counterclaim, cross-claim or third-party claim that sought a recovery over $10,000 may be appealed to an appellate panel of the Board ("Appellate Panel"). All other decisions rendered by an arbitration panel are final and may not be appealed. In order to appeal a decision, a party must, within 10 days of receipt of the notice of decision, file with the Market Regulation Department a written request stating the grounds for the appeal and the specific error or impropriety of the original decision based upon the standards set forth in Rule 620 and deposit the applicable fee established by the Exchange. Within 15 days of receipt of the notice of decision, the appellant must deposit with the Market Regulation Department a cashier's or certified check payable to CME Group in the amount of any monetary award against such appellant.

Failure to timely comply with these requirements for appeal, when applicable, shall constitute a waiver of any right to appeal and render the arbitrators' decision final and binding.

Within 15 days after filing a request for an appeal, the appellant shall file with the Market Regulation Department any argument and any documents or information that the appellant intends to use in support of the appeal. The appellee shall have 15 days thereafter to file whatever documents or information they intend to rely upon in opposition to the appeal. An extension beyond the 15-day filing period may be granted by the Market Regulation Department upon a showing of good cause. In the case of a non-cash award, the filing of the notice of appeal shall not stay the decision appealed from unless the panel from which the appeal is taken or the Chief Regulatory Officer specifically directs that the decision be stayed.

The appeal will be determined by an Appellate Panel consisting of three directors appointed by the Chairman of the Board, one of whom the Chairman of the Board shall designate as chairman of the Appellate Panel. No director may serve on an Appellate Panel if they have a personal or financial interest in the matter under consideration. A party may strike any member of the Appellate Panel for good cause shown as determined by the Chief Regulatory Officer, in which event that director shall be excused and the Chairman of the Board shall then select an alternate director from the Board. Any meeting of the Appellate Panel shall require the presence, either in person or by telephone, of each director appointed to the Appellate Panel and shall be conducted by the chairman of the Appellate Panel.

The Appellate Panel may, by unanimous vote, determine that the appeal will be decided based solely upon the parties' written submissions, the record from the arbitration proceeding and any other relevant information provided by the parties to the Appellate Panel. Any information provided by one party must be provided to all parties to the appeal. Additionally, the parties may, upon unanimous consent, request that the Appellate Panel consider the matter based solely on the parties' written submissions, subject to the approval of the Appellate Panel.

620. STANDARDS AND PROCEDURES FOR REVIEW UPON APPEAL

In the following cases, the hearing committee may enter an order amending or vacating the award of the arbitration panel:

A. Where the award was procured by corruption, fraud or undue means;

B. Where there was evident partiality or corruption on the part of any of the arbitrators or the chairman;

C. Where the arbitrators were guilty of misconduct in refusing to hear relevant evidence; or of any other behavior by which the rights of any party have been prejudiced;

D. Where the arbitrators exceeded their powers, or so imperfectly executed them that a mutual, final, and definite award upon the dispute submitted was not made; or

E. Where the arbitrators acted in manifest disregard of the applicable law, including Exchange rules.

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The hearing committee shall consider only the record made before the panel and any other evidence submitted by the parties relevant to A. through E. above. In the event that the hearing committee determines to vacate the award, the matter shall be resubmitted to a new panel of arbitrators for a rehearing. In the event that the hearing committee amends the award or denies the appeal, such decision of the hearing committee shall be final and binding.

ADDITIONAL CLAIMS

621. CERTAIN CLAIMS AGAINST THE EXCHANGE INVOLVING TRADING SYSTEMS OR SERVICES

621.A. General

All claims arising out of or relating to the following matters shall be arbitrated in accordance with the specific requirements of this Rule 621 and, to the extent not inconsistent with such requirements, the rules of this Chapter:

1. receipt of an incorrect order status or the failure to have received an appropriate order status;
2. the negligence of GCC personnel or any other Exchange staff; or
3. Phantom Orders, as defined in Rule 578.F.

Nothing in Rules 621 or 622 shall be construed to create a claim against the Exchange, to limit a defense available to the Exchange, or to obviate or modify any limitation of Exchange liability imposed by any other rule.

621.B. Initial Liability Claim and Demand for Arbitration

The initial claim of loss, including a detailed description of any loss suffered, must be made to the Exchange within ten business days of the date of the incident that caused the loss. The Exchange shall have 30 business days to pay or deny the claim in whole or in part. If the Exchange denies the claim in whole or in part, the claimant must file a written demand for arbitration with the Market Regulation Department within ten business days after the Exchange has notified the claimant of such denial. A claimant's failure to pursue its claim within these time limits shall bar any recovery on such claim.

621.C. Selection of Arbitration Panel

The arbitration panel shall consist of three non-member arbitrators from the Exchange's Arbitration Committee. The panel shall choose a chairman.

621.D. Related Claims

All claims arising out of the same system failure, event or alleged negligent act shall, to the extent practicable in the determination of the chairman, be consolidated for a single hearing.

621.E. Award

Within 30 days of completion of the hearing, the panel shall issue a written decision. The award shall be limited to the lesser of the actual loss or the loss that would have been incurred if the claimant had used its best efforts to mitigate the loss. Punitive damages, loss of profits, loss of use, and indirect, incidental or consequential damages shall not be awarded. The decision of a majority of the panel shall be final and binding, and there shall be no appeal to a hearing committee of the Board of Directors. A party may move, within three business days of the award, that the award be corrected to remedy any miscalculation or misdescription or where the award is otherwise imperfect in a matter of form not affecting the merits of the award.

621.F. Satisfaction of Award by Exchange

The Exchange shall satisfy any award against it subject to its limitation of liability rules and the rules respecting proration among claimants where damages allowed for a defined period of time exceed any limit imposed by Exchange rules. The Exchange may delay paying any award until such time as any applicable proration or limitation can be finally calculated.

622. CLAIMS RELATING TO TRADE CANCELLATIONS OR PRICE ADJUSTMENTS

622.A. General

All claims relating to price adjustments or trade cancellations pursuant to Rule 588 shall be arbitrated in accordance with the specific requirements of this Rule 622 and, to the extent not

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inconsistent with such requirements, the rules of this Chapter.

622.B. Initiation of Claim

Any claim for loss under Rule 588 must first be submitted to the Exchange as described in Rule 588.E. Following a denial of liability by a party responsible for a trade cancellation or price adjustment and by the clearing firm through which the trade was placed, the claimant may file an arbitration claim with the Market Regulation Department. The Market Regulation Department shall administer the arbitration and provide notice to all parties.

The party alleged to have made the trade that caused the trade cancellation or price adjustment and the clearing firm through which that trade was placed both may be respondents in the arbitration. Any party responsible for a trade cancellation or price adjustment who is not otherwise subject to arbitration under these rules may voluntarily submit to such arbitration by filing a submission agreement with the Market Regulation Department within 21 days of that party's receipt of notice of the referral to arbitration. In the absence of the voluntary submission to arbitration by such party, the arbitration shall proceed solely against the clearing firm through which the trade was placed, and that firm shall be liable for any damages awarded by the panel.

622.C. Related Claims

All claims arbitrable under this rule that arise out of a trade cancellation or price adjustment that was caused by the same incident shall, to the extent practicable in the determination of the chairman, be consolidated for a single hearing.

622.D. Award

Within 30 days of completion of the hearing, the panel shall issue a written decision signed by a majority of the arbitrators. Except as provided below, the claims shall be limited to realized losses. Any award shall be made jointly and severally against the respondents. In the event the panel finds the respondent(s) liable for the full amount of the claim, the panel shall also award the claimants their costs and attorneys fees incurred in connection with arbitrating the claim.

Punitive damages, loss of profits, loss of use, and indirect, incidental or consequential damages shall not be awarded. The decision of a majority of the panel shall be final and may not be appealed. A party may move, within three business days of the award, for an order correcting or modifying the award to remedy any miscalculation or misdescription or where the award is otherwise imperfect in a matter of form not affecting the merits of the award.

MISCELLANEOUS

623. RIGHT TO COUNSEL

Every person is entitled to represent their own interests, be represented by an attorney at law of their choosing and at their own expense who is admitted to practice before the highest court in any State, or be represented by any other non-compensated representative at any stage of an arbitration proceeding at the Exchange. An entity must be represented by an officer or owner of the entity or by an attorney at law. Notwithstanding the above, no person may be represented by a member of the Arbitration Committee, a member of the Board, an employee of CME Group or any person related to the arbitration.

624. COMPUTATION OF TIME

For the purposes of this Chapter, when a period of time is prescribed by a number of days, and not a specific date, the first day counted for the time prescribed is the day after notice is received or other event giving rise to the period of time occurs. Any submission is due or the time to take action shall lapse by the close of business on the last day counted, unless the last day is a weekend or Exchange holiday, in which case the due date shall be the next following day the Exchange is open for business.

For time periods of five days or less only days the Exchange is open for business will be counted. For all other time periods calendar days will be counted.

625. SUBMISSIONS TO OR COMMUNICATIONS WITH THE PANEL

Any submission for consideration by a chairman or panel must be submitted to the Market Regulation Department with copies simultaneously served on each other party or designated representative of a party.

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After a dispute has been submitted for arbitration, a person filing the claim or required to respond to the claim and any person asked to provide documents, information or testimony in connection with such claim shall not contact any member of a panel appointed to hear the claim for any purpose related to the dispute described by the claim.

626. ARBITRATION FEES

Any person submitting an arbitration claim or appealing a decision of an arbitration panel shall remit the applicable fees as may be determined by the Exchange at the time of submission or appeal, in order for such action to be effective.

ARBITRATION COMMITTEE

627. ARBITRATION COMMITTEE

Each member of the Arbitration Committee shall:

A. be appointed by the Board Chairman on an annual basis;

B. pledge to the Exchange that they will not publish, divulge, or make known in any manner any facts or information which may come to their attention while performing their duties as a member of the Arbitration Committee, except when reporting to the Board, or to a committee concerned with such information, or when called upon to respond in any judicial or administrative proceeding;

C. comply with the standards of the American Bar Association-American Arbitration Association's "Code of Ethics for Arbitrators in Commercial Disputes" which the Exchange hereby adopts as its own code of ethics for arbitrators;

D. pledge to immediately disclose any matter, relationship or interest with any party or the subject of a dispute which may affect the arbitrator's ability to be, or create the appearance that the arbitrator is not, impartial in deliberating and deciding a dispute; and

E. promptly give notice to the Market Regulation Department of any ex parte communication directed to such Arbitration Committee member which is prohibited by Rule 625.

(End of Chapter 6)

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CHAPTER 7
DELIVERY FACILITIES AND PROCEDURES

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Chapter 7
Delivery Facilities and Procedures

GENERAL

700. SCOPE OF CHAPTER

Deliveries and delivery facilities shall be governed by this chapter and, where applicable, the chapter which includes the contract specifications for the commodities being delivered and such other requirements as the Exchange may prescribe.

For purposes of these Rules, unless otherwise specified, times referred to herein shall refer to and indicate Chicago time.

701. DECLARATIONS OF FORCE MAJEURE

If a determination is made by the Chief Executive Officer, Chairman, Chief Operating Officer, or Chief Regulatory Officer, or their delegate, that delivery or final settlement of any contract cannot be completed as a result of Force Majeure, they hall take such action as they deem necessary under the circumstances, and their decision shall be binding upon all parties to the contract. The Exchange shall notify the CFTC of the implementation, modification or termination of any action taken pursuant to this Rule as soon as possible after taking the action.

It shall be the duty of clearing members, members and regular facilities to notify the Exchange of any circumstances that may give rise to a declaration of Force Majeure.

Nothing in this Rule shall in any way limit the authority of the Board of Directors to act in a Force Majeure situation pursuant to Rule 230.k.

702. CLEARING MEMBER DUTIES TO THE CLEARING HOUSE

Every clearing member carrying open long or short positions shall present to the Clearing House each business day an accurate inventory of such open positions. The inventory of open long and short positions shall be reported to the Clearing House in such manner and at such times as the Clearing House may prescribe.

A clearing member, carrying an account that is required to make or accept delivery, agrees to guarantee and assume complete responsibility for the performance of all delivery requirements set forth in the Rules, including the requirement that delivery margin must be deposited with the Clearing House in such amounts and in such form as required by the Exchange.

In the event a clearing member fails to perform its delivery obligations to the Clearing House, such failure may be deemed a default pursuant to Rule 802. In a delivery failure, the Clearing House shall ensure the financial performance to the clearing member whose actions or omissions did not cause or contribute to the delivery failure (the “Affected Clearing Member”). In this regard, the Clearing House powers will include, but will not be limited to, the right to sell or liquidate the commodity subject to delivery and to distribute the proceeds as appropriate. “Financial performance” means payment of the commercially reasonable costs of the Affected Clearing Member related to replacement of the failed delivery and includes any related fines, penalties and fees incurred by the Affected Clearing Member and does not include physical performance or legal fees.

An Affected Clearing Member seeking financial performance from the Clearing House shall provide prompt notice to the Clearing House of the delivery failure and a good faith estimate of any financial performance being sought no later than 1 hour after the delivery deadline for the respective product, which may be extended upon request by the Affected Clearing Member by the Global Head of Clearing or their designee due to extenuating circumstances. As soon as reasonably practicable thereafter, the Affected Clearing Member seeking financial performance shall provide to the Clearing House a detailed statement, with supporting documentation, of all amounts sought.

DELIVERY FACILITIES AND PROCEDURES FOR AGRICULTURAL COMMODITIES

703. APPROVED LIVESTOCK YARDS AND SLAUGHTER PLANTS FOR LIVE CATTLE

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703.A. Conditions for Approval

Deliveries on Exchange contracts of live beef cattle can be made only at slaughter plants or public livestock yards designated and approved for delivery by the Exchange.

Livestock yards and slaughter plants (hereafter "facilities") may be declared regular for delivery with the approval of the Exchange. Persons operating facilities who desire to have such facilities made regular for delivery under the Rules of the Exchange shall make application for initial Declaration of Regularity on a form prescribed by the Exchange prior to January 1 for a one-year term beginning February 1, and at any time during a current term for the balance of that term.

Applications for renewal of regularity shall be made prior to January 1 for the respective year beginning February 1, and shall be on the same form as prescribed by the Exchange.

The Exchange, in its sole discretion, may determine and publish maximum daily live delivery limits (maximum grading capacity) for futures contracts at approved livestock yards (see Interpretations & Special Notices Relating to Chapter 7 for the current limits). These limits are subject to change based on changes such as livestock yard infrastructure (e.g., scales, holding pens, etc.) and availability of USDA grading personnel.

Regular facilities that desire to increase their regular daily limits during a current term shall make application for the desired amount of total regular daily limit on the same form as prescribed by the Exchange.

Initial regularity and increases in regularity for delivery against a listed futures contract shall be effective either thirty days after the Exchange posts a notice that a bona fide application has been received or the day after the application is approved by the Exchange, whichever is later.

Regular facilities that wish to have their regular daily limit decreased shall file with the Exchange a written request for such decrease and such decrease shall become effective once a notice has been posted by the Exchange.

The Exchange may establish such requirements and conditions for approval of regularity as it deems necessary. The application for regularity prescribed by the Exchange shall set forth conditions of regularity as well as other agreements with which the operator of the regular facility shall comply. In addition to any conditions and agreements contained in such application or in the relevant product chapter, the following shall constitute conditions for regularity and requirements with which the operator of a regular facility shall comply:

(1) The facility making application shall be subject to inspection by the Exchange, the United States Department of Agriculture, or other government agency, as applicable.

(2) A public livestock yard shall be a stockyard within the definition of the Packers and Stockyards Act, 1921 as amended, and shall have received notice to that effect from the Secretary of Agriculture.

(3) The slaughter plant shall slaughter primarily fed cattle in the normal course of business, have a fed cattle slaughter capacity of at least 500 head per day, and have proper facilities for weighing and grading.

(4) The facility must be registered and bonded with the Grain Inspection, Packers & Stockyards Administration ("GIPSA") of the U.S. Department of Agriculture.

(5) The facility shall be provided with modern improvements and appliances for the convenient and expeditious receiving, handling and shipping of product.

(6) The operator of the facility shall promptly notify the Registrar of any damage to the facility that prevents the facility from performing its delivery obligations under Exchange Rules.

(7) The operator of the facility shall permit the Exchange, at any time, to examine the books and records of the facility in connection with deliveries against the contract.

(8) The operator of the facility shall be required to keep such records, make such reports and be subject to inspection and regulation by the Secretary of Agriculture, as provided in said Packers and Stockyards Act.

(9) The operator of the facility shall make such reports, keep such records and permit such facility visitation as the Exchange, the Commodity Futures Trading Commission or any other applicable government agency may require.

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(10) The facility must have scale(s) installed, maintained and operated in accordance with GIPSA requirements.

(11) The operator of the facility shall not engage in unethical or inequitable practices, and shall comply with all applicable governmental laws, federal or state statutes, rules or regulations.

(12) The facility shall immediately notify the Exchange of any changes in ownership or management of the facility.

(13) The facility has secure holding pens with access to feed and water.

(14) The facility must have the ability to segregate into secure holding areas cattle without access to feed or water.

(15) The operator of the facility must provide the Exchange, on an annual basis, with its black-out dates, routine shutdown dates and must immediately notify the Exchange with any changes to those dates or any other unscheduled blackout or shutdown dates or events that will prevent the facility from performing its delivery obligations under Exchange Rules.

(16) Persons operating regular facilities shall be subject to the Rules of the Exchange, the disciplinary procedures set forth in Chapter 4, and the arbitration procedures set forth in Chapter 6, and shall abide by and comply with the terms of any disciplinary decision imposed or any arbitration award issued against it pursuant to the Rules of the Exchange.

(17) Persons operating regular facilities shall consent to the disciplinary jurisdiction of the Exchange for five years after such regularity lapses, for conduct which occurred while the facility was regular.

The Exchange, in its sole discretion, may determine not to approve facilities for regularity, or for increases in regular daily limits of existing regular facilities, regardless of whether such facilities meet the preceding requirements and conditions. Some factors that the Exchange may, but is not required to, consider in exercising its discretion include, among others, whether deliveries at such facilities, if tendered in satisfaction of futures contracts, might be expected to adversely affect the price discovery function of futures contracts or impair the efficacy of futures trading in the relevant market, or whether the currently approved regular daily limits provide for an adequate deliverable supply.

703.B. Delivery Location

Livestock yards must be located in any of the following territories:

(1) Colorado;
(2) Iowa, Minnesota, South Dakota;
(3) Kansas;
(4) Nebraska;
(5) Texas, Oklahoma, New Mexico.

Slaughter plants must be located within a 225-road mile radius of one or more approved livestock yards.

704. REVOCATION, EXPIRATION OR WITHDRAWAL OF REGULARITY

The Business Conduct Committee may revoke a declaration of regularity whenever a regular facility fails to comply with the conditions specified in this Chapter, any other conditions to which it has agreed in its application for regularity, or any other Rules of the Exchange.

Unless a shorter notification period is otherwise authorized by the Exchange, a facility shall give six (6) months prior written notice to the Exchange prior to withdrawing from regularity.

If the designation of a facility as regular is withdrawn or revoked, a notice shall be posted announcing such withdrawal or revocation and the period of time, if any, during which deliveries can be made through such facility in satisfaction of futures contracts under the Rules of the Exchange.

705. [RESERVED]

706. APPLICATION FOR GRADING

Application for live beef cattle gradings to be used for delivery on Exchange transactions must be filed by clearing members with the Clearing House. Requests for gradings will be forwarded to the appropriate government office in the order in which applications are received.

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707.-709. [RESERVED]

710. LIABILITY FOR NEGLIGENCE OF GRADERS

The Exchange shall not be liable for any error or negligence of any grader. In all delivery matters, the determination of the USDA grader, for live-graded deliveries, or the USDA Meat Grader, for carcass-graded deliveries, shall be final and binding on all parties.

711. FINALITY OF USDA OR OTHER REQUIRED GRADING CERTIFICATE

The Exchange assumes no responsibility and disclaims all liability on account of the grade, quantity or specifications of any commodity delivered on the basis of a USDA or other required grading certificate.

712. [RESERVED]

713. DELIVERY PROCEDURES

713.A. Notice of Intent to Deliver

Where delivery requires a Notice of Intent to Deliver, the buyer and seller shall comply with the requirements of the relevant Rules and such requirements as are prescribed by the Exchange and the Clearing House.

713.B. Delivery Notice

Upon determining the buyers obligated to accept deliveries tendered by issuers of delivery notices, the Clearing House shall promptly furnish to each issuer the names of the buyers obligated to accept delivery for each commodity for which a notice was tendered and shall also inform the issuer of the number of contracts for which each buyer is obligated.

713.C. Possession of Product and Relevant Documents

The seller shall by such time as is prescribed in the relevant contract specification chapter on the day of tender have possession of the product and all relevant documents.

713.D. Notice to Buyers

The Clearing House promptly shall pass the Delivery Notices in the order in which they are received to the clearing members obligated by the oldest open long contracts to take delivery of the same amounts of the same commodities for the same delivery month. When a member of the Clearing House who has open purchases is suspended from the Clearing House for default or insolvency, they shall be deemed out of line for delivery and tender shall be made to the clearing member obligated upon the next oldest long contract. Also, if tender is made to a clearing member who is thereafter suspended for default or insolvency before delivery is accepted, then, subject to the provisions of Rule 718, the Delivery Notice shall be withdrawn and another immediately served upon the clearing member obligated upon the next oldest long contract.

713.E. Payment

Unless otherwise specifically provided in the relevant contract specification chapter, a buyer receiving a Delivery Notice from the Clearing House shall make payment in same day funds, for the net invoicing price. The buyer shall then be entitled to all required documents in proper form and with such endorsements as may be necessary to convey title and possession and as are necessary to expedite shipment. The buyer shall also be entitled to all other documents as are otherwise required by the provisions of the relevant contract specification chapter.

714. FAILURE TO DELIVER

In the event a clearing member fails to fulfill its specific delivery obligations pursuant to Exchange rules, the sole obligation of the Clearing House is to pay reasonable damages proximately caused by such delivery obligation failure, in an amount which shall not exceed the difference between the delivery price of the specific commodity and the reasonable market price of such commodity at the time delivery is required according to the rules of the Exchange. The Clearing House shall not be obligated to: (1) make or accept delivery of the actual commodity; or (2) pay any damages relating to the accuracy, genuineness, completeness, or acceptableness of certificates, instruments, warehouse receipts, shipping certificates, or other similar documents; or (3) pay any damages relating to the failure or insolvency of banks, depositories, warehouses, shipping stations, or similar organizations or entities that may be involved with a delivery.

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Notwithstanding any provision of the rules, the Clearing House has no obligation or liability to any clearing member or any other person relating to a failure to fulfill a delivery obligation unless it is notified by the clearing member that did perform, or was in a position to perform its delivery obligations, that a failure occurred, as soon as possible, but in no event later than 1 hour after the delivery deadline for the respective product, which may be extended by the Global Head of Clearing or their designee pursuant to the provisions of Rule 702.

If a clearing member does not fulfill its delivery obligations to another clearing member, it shall be responsible to the Clearing House for any damages incurred by the Clearing House as a result of such delivery obligation failure.

A failure by a clearing member carrying a short futures position to tender a Delivery Notice on or before the time specified by the Clearing House on the last day on which such notice is permitted shall be deemed a violation of this rule, except that the Global Head of Clearing may, for good cause, extend the time to present such notice.

Unexcused failure to make delivery shall be deemed an act detrimental to the interest or welfare of the Exchange. In addition to any penalties imposed as provided in Chapter 4, the Clearing House Risk Committee shall determine and assess the damages incurred by the buyer.

715. FAILURE TO ACCEPT DELIVERY OR REMIT FULL PAYMENT

Where a buyer to whom a delivery has been assigned by the Clearing House fails to take such delivery and make payment when payment is due, the seller tendering such delivery shall immediately notify the Clearing House. If a clearing member obligated to receive delivery fails to make full payment to the seller, the Clearing House shall debit the account of said clearing member an amount sufficient to complete the delivery.

Failure to accept delivery or to remit full payment shall be deemed an act detrimental to the interest or welfare of the Exchange.

716. DUTIES OF CLEARING MEMBERS

Prior to the last day of trading in a physically delivered contract, each clearing member shall be responsible for assessing the account owner's ability to make or take delivery for each account on its books with open positions in the expiring contract. Absent satisfactory information from the account owner, the clearing member is responsible for ensuring that the open positions are liquidated in an orderly manner prior to the expiration of trading.

717. [RESERVED]

718. CUSTOMER SUBSTITUTION IN THE EVENT OF CLEARING MEMBER BANKRUPTCY

In the event that an "order for relief" as defined at CFTC Reg. 190.01(ee) has been entered in respect to a clearing member whose customer holds a futures contract or options contract that may only be liquidated by physical delivery and, as to such contract:

(i) trading has ceased on the date of the entry of the "order for relief;"

(ii) notice of delivery has been tendered on or before the date of the entry of the "order for relief;" or

(iii) trading ceases before the trustee can liquidate the contract;

then, notwithstanding Rule 713.D., the Clearing House shall allow the customer (if their identify can be readily ascertained and verified) to be directly substituted for the debtor clearing member to the extent necessary to complete delivery. None of the requirements for delivery, including notices, instructions, payment, etc., shall be waived hereby. Moreover, substitution shall in no way relieve the debtor clearing member of its obligations to the Clearing House and the opposite clearing member in regard to any claims arising out of that delivery.

719. INITIAL REGULARITY FOR DELIVERY AGAINST A NEW FUTURES CONTRACT

Initial regularity for delivery against a new futures contract concurrent with the listing of such new futures contract shall be effective either fifteen days after the Exchange posts a notice that a bona fide application has been received or the day after the application is approved by the Exchange, whichever is later.

720. - 729. [RESERVED]

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CLS CURRENCY DELIVERIES

730. DELIVERY THROUGH CLS BANK

Consistent with procedures prescribed by the CME Clearing House, CME deliverable currency contracts are required to be physically delivered through the CLS (Continuous Linked Settlement) Bank System where both the trading unit currency and the price increment (minimum fluctuation) currency are supported by CLS delivery procedures. Notwithstanding the foregoing, a clearing firm shall not be required to make physical delivery through the CLS Bank System (i) for any currency contract where the delivery exposure of the clearing firm is reasonably expected not to exceed $25 million for any one currency contract or (ii) for any currency contract delivery obligations below $50 million, measured across all the clearing member's CLS-eligible currency contracts in the aggregate, where more than one currency is required to be delivered. Clearing firms delivering CME currency contracts must use an approved CLS agent bank for deliveries through CLS Bank, which may be any approved CLS agent bank. If practicable, in those situations where clearing firms delivering CME currency contracts use the same CLS Agent Bank for delivery, then physical delivery may occur by book entry at the same CLS Agent Bank and not be settled through the CLS Bank.

When buyers and sellers elect to do currency deliveries through the CLS System, they agree to abide by the deadlines and compensation conventions established by the CLS agent bank it uses and the CLS Bank. The CME Clearing House's obligation to the delivery transaction ends when payment is made through the CLS System. The CME Clearing House's sole obligation with respect to the delivery transaction shall be its obligation to ensure financial performance pursuant to Rule 702.

731. FOREIGN CURRENCY BUYER'S DUTIES FOR CLS DELIVERIES

A clearing member that intends to accept delivery of a foreign currency through the CLS System to liquidate a net long position in that foreign currency shall, no later than 11:00 a.m. Chicago time on the last day of trading, present to the Clearing House a Buyer's CLS Delivery Commitment, which identifies the CLS agent bank used by the buyer and the number of contracts and the component delivery values. Also, the clearing member/customer shall arrange with its CLS agent bank to input the relevant instructions into the CLS System no later than 1:00 p.m. Chicago time on the business day proceeding the delivery day.

A match of delivery information must occur in order for a delivery transaction to be finalized. In the event that clearing member/customer instructions are not entered into the CLS System by 1:00 p.m. Chicago time on the business day preceding the delivery day, then the unmatched transaction may not be completed and paid on the delivery date through the CLS System. In such event, delivery instructions may be resubmitted to the CLS agent bank for delivery on the subsequent business day. Also in such event, the Clearing House may assess fines for the delayed delivery. Further, if the delivery instructions remain unmatched by 1:00 p.m. Chicago time on the business day preceding the delivery day, the Clearing House may require the buyer of the foreign currency to post an Order to Pay to the appropriate Agent Bank by no later than the close of business that day, in addition to complying with other procedures as outlined in the Clearing House Manual.

If the Buyer's CLS Delivery Commitment is received later than 11:00 a.m. Chicago time on the last day of trading, but not later than 8:00 a.m. Chicago time on the following day, the buyer's clearing member shall be assessed a fine on a per contract basis, the amount to be determined by Exchange staff. Any deliveries memoranda or instructions received subsequent to 8:00 a.m. Chicago time on the day following the last day of trading shall be deemed a delivery obligation failure and acted upon in accordance with Rule 743.B. The buyer shall have made all provisions necessary to receive delivery within the country of issuance.

732. FOREIGN CURRENCY SELLER'S DUTIES FOR CLS DELIVERIES

A clearing member representing a customer delivering foreign currency through the CLS System to liquidate a net short position in that foreign currency shall, no later than 11:00 a.m. Chicago time on the last day of trading, present to the Clearing House a Seller's CLS Delivery Commitment, which identifies the CLS agent bank used by the seller and the number of contracts and the component delivery values. Also, the clearing member/customer shall arrange with its CLS agent bank to input the relevant instructions into the CLS System no later than 1:00 p.m. Chicago time on the business day proceeding the delivery day.

A match of delivery information must occur in order for a delivery transaction to be finalized. In the event that clearing member/customer instructions are not entered into the CLS System by 1:00 p.m.

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Chicago time on the business day preceding the delivery day, then the unmatched transaction may not be completed and paid on the delivery date through the CLS System. In such event, delivery instructions may be resubmitted to the CLS agent bank for delivery on the subsequent business day. Also, in such event, the Clearing House may assess fines for the delayed delivery. Further, if the delivery instructions remain unmatched by 1:00 p.m. Chicago time on the business day preceding the delivery day, the Clearing House may require the seller of the foreign currency to comply with other procedures as outlined in the Clearing House Manual.

If the Seller's CLS Delivery Commitment is received later than 11:00 a.m. Chicago time on the last day of trading, but not later than 8:00 a.m. Chicago time on the following day, the seller's clearing member shall be assessed a fine on a per contract basis, the amount to be determined by Exchange staff. Any deliveries memoranda or instructions received subsequent to 8:00 a.m. Chicago time on the day following the last day of trading shall be deemed a delivery obligation failure and acted upon in accordance with Rule 743.B.

733. DELIVERY DATE

Delivery shall be completed in accordance with the specifications of the separate contracts.

734.-735. [RESERVED]

736. REGISTERED BANKS AND OTHER FACILITIES

Exchange staff shall establish such requirements and preconditions for registration as a facility for the delivery of currencies as it deems necessary.

NON-CLS (LEGACY) CURRENCY DELIVERIES

737. FOREIGN CURRENCY BUYER'S DUTIES

737.A. Currency Contracts

A clearing member representing a customer that intends to accept delivery of a foreign currency in liquidation of their net long position in that foreign currency shall, no later than 11:00 a.m. on the last day of trading, except for Turkish Lira/ U.S. Dollar present to the Clearing House a Buyer's Non-CLS Delivery Commitment. Turkish Lira/ U.S. Dollar commitments shall be submitted to the Clearing House within one hour following termination of trading on the last day of trading. In addition, the clearing member shall either deposit, or present a bank Order to Pay, an amount equal to the net U.S. dollar value of such customer's positions. Values for positions in contracts with minimum fluctuations denominated in U.S. dollars shall be the contract value based on the settlement price on the last day of trading. Values for positions in contracts with minimum fluctuations in foreign currency shall be the contract size. If the buyer elects to pay by deposit, the deposit shall be made by 1:00 p.m. on the first day preceding the delivery day that is a business day common to the Exchange, Chicago banks and New York City banks for all other currencies. Such deposit shall be in the form of a wire transfer of same-day funds to an account at a bank designated by the Clearing House. If the buyer elects to pay by bank Order to Pay, an Order to Pay from an Exchange-approved bank shall be presented to a bank designated by the Clearing House by 1:00 p.m. on the first day preceding the delivery day that is a business day common to the Exchange, Chicago banks and New York City banks for all other currencies. The Bank Order to Pay shall be in a form approved by the Clearing House and shall promise to pay same-day funds on the delivery day.

737.B. Physical Delivery Currency Cross-Rate and Israeli Shekel Contracts

A clearing member representing a customer that intends to accept delivery of a Physical Delivery Currency Cross-Rate or Israeli Shekel Contract in liquidation of their position shall, no later than 11:00 a.m. on the last day of trading, present to the Clearing House a Buyer's Non-CLS Delivery Commitment. In addition by 1:00 p.m. on the first day preceding the delivery day that is a business day common to the Exchange, Chicago banks and New York City banks, the clearing member shall either deposit, or present a Bank Order to Pay, an amount in the minimum-fluctuation currency equal to the contract value based on the settlement price on the last day of trading. Such deposit shall be in the form of same-day funds to an account at a bank designated by the Clearing House. The bank Order to Pay shall be in a form approved by the Clearing House, and shall promise to pay same-day funds on the delivery day.

737.C. Physical Delivery Euro versus Polish Zloty, Hungarian Forint and Czech Koruna Cross-Rate Contracts

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A clearing member representing a customer that intends to accept delivery of Polish zloty, Hungarian forint or Czech koruna in liquidation of their net long position in that foreign currency shall, no later than 11:00 a.m. on the last day of trading, present to the Clearing House a Buyer's Non-CLS Delivery Commitment. In addition, the clearing member shall either deposit, or present a bank Order to Pay, an amount equal to the net Euro value of such customer's positions. Values for positions in contracts with minimum fluctuations denominated in Euros shall be the contract value based on the settlement price on the last day of trading multiplied by the trading unit. If the buyer elects to pay by deposit, the deposit shall be made by 9:00 a.m. on the first business day preceding the delivery day that is a business day common to the Exchange, Chicago banks, New York City banks and banks for the Euro ("Target system banks"). Such deposit shall be in the form of a wire transfer of same-day funds to an account at a bank designated by the Clearing House. If the buyer elects to pay by bank Order to Pay, an Order to Pay from an Exchange-approved bank shall be presented to a bank designated by the Clearing House by 1:00 p.m. on the first business day preceding the delivery day that is a business day common to the Exchange, Chicago banks, New York City banks and banks for the Euro ("Target system banks"). The Bank Order to Pay shall be in a form approved by the Clearing House, and shall promise to pay same-day funds on the delivery day.

Subject to the preceding three paragraphs, if the Buyer's Non-CLS Delivery Commitment is received later than 11:00 a.m. on the last day of trading, but not later than 8:00 a.m. on the following day, the buyer's clearing member shall be assessed a fine on a per contract basis, the amount to be determined by Exchange staff. Any deliveries memoranda or instructions received subsequent to 8:00 a.m. on the day following the last day of trading shall be deemed a delivery obligation failure and acted upon in accordance with Rule 743.B. The buyer shall have made all provisions necessary to receive delivery within the country of issuance.

737.D. Reserved

737.E. Reserved

737.F. Restrictions

From time to time, and frequently without warning, countries change the requirements and the restrictions on non-resident bank accounts. These take various forms including, but not limited to, non-interest-bearing deposit requirements, negative interest rates, prohibitions against investment in the country, ceilings on the amount of deposit and restrictions on the period of time such deposits may be maintained. It is the buyer's responsibility to be familiar with and in conformance with all regulations pertaining to the holding of non-resident bank accounts in the country in which they desired to accept delivery.

738. FOREIGN CURRENCY SELLER'S DUTIES

738.A. U.S. Dollar-Based Currency Contracts, Euro versus Polish Zloty, Hungarian Forint, Czech Koruna Cross-Rate Contracts

The clearing member representing a customer delivering foreign currency in liquidation of their net short position shall, no later than 11:00 a.m. on the last day of trading, present to the Clearing House a Seller's Non-CLS Delivery Commitment except Turkish Lira/ U.S. Dollar. Turkish Lira/ U.S. Dollar commitments shall be submitted to the Clearing House within one hour following termination of trading on the last day of trading.

738.B. Physical Delivery Currency Cross-Rate

The clearing member representing a customer making delivery of a Physical Delivery Currency Cross-Rate Contract, except for cross-rate contracts referenced in Rule 738.A., in liquidation of their position shall, no later than 11:00 a.m. on the last day of trading, present to the Clearing House a Seller's Non-CLS Delivery Commitment. In addition, by 1:00 p.m. on the first day preceding the delivery day that is a business day common to the Exchange, Chicago banks and New York City banks, the clearing member shall either deposit, or present a Bank Order to Pay, an amount equal to the trading unit. Such deposit shall be in the form of same-day funds to an account at a bank designated by the Clearing House. The Bank Order to Pay shall be in a form approved by the Clearing House, and shall promise to pay same-day funds on the delivery day. The Seller shall have made all provisions necessary to receive delivery of the minimum-fluctuation currency within the country of issuance. The Seller's clearing member shall be responsible for delivering the foreign currency on the delivery date to a bank designated by the Clearing House. The Exchange reserves the right to eliminate the requirement for sellers to post a Bank Order to Pay in the event that a given country's payments systems, which previously required a prior Bank Order to Pay posting, implements same-day finality of payment.

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Subject to the preceding two paragraphs, if the Seller's Non-CLS Delivery Commitment is received later than 11:00 a.m. on the last day of trading, but not later than 8:00 a.m. on the day following the last day of trading, the seller's clearing member shall be assessed a fine on a per-contract basis, the amount to be determined by Exchange staff. Any deliveries memoranda or instructions received subsequent to 8:00 a.m. on the day following the last day of trading, shall be deemed a delivery obligation failure and acted upon in accordance with Rule 743.B.

738.C. Reserved

738.D. Reserved

738.E. Restrictions

From time to time, and frequently without warning, countries change the requirements and the restrictions on non-resident bank accounts. These take various forms including, but not limited to, non-interest-bearing deposit requirements, negative interest rates, prohibitions against investment in the country, ceilings on the amount of deposit and restrictions on the period of time such deposits may be maintained. It is the seller's responsibility to be familiar with and in conformance with all regulations pertaining to the holding of non-resident bank accounts in the country in which they desired to make delivery.

739. DELIVERY DATE

Delivery shall be completed in accordance with the specifications of the separate contracts.

740. PAYMENTS

The Clearing House shall designate a bank in each foreign country into which foreign currency shall be delivered. These banks shall notify the Clearing House when foreign currency funds have been received. In the case of Currency Contracts, the foreign currency delivery for each customer shall equal the net short value of positions in that foreign currency. Values for positions in contracts with minimum fluctuations denominated in U.S. dollars shall be the contract size. Values for positions in contracts with minimum fluctuations in foreign currency shall be the contract value based on the settlement price on the last day of trading. In the case of Currency Contracts, the Clearing House shall, promptly after receipt of notification that foreign currency funds have been received, transfer the U.S. dollar funds previously deposited by the foreign currency buyer's clearing member to the account of the foreign currency seller's clearing member.

741. COSTS OF DELIVERY

The deliverer of a foreign currency shall bear the costs of transferring the foreign currency into a bank designated by the Clearing House. The receiver of a foreign currency shall bear the costs of transferring the foreign currency out of the bank designated by the Clearing House. Such costs may include, but are not limited to, wire transfer charges, negative interest charges and transaction fees.

742. DELIVERY NETTING

742.A. CLS Delivered Currency Futures Contracts

Exchange currency futures contracts delivered through the CLS Bank shall be netted according to procedures specified by the Clearing House from time to time.

742.B. Non-CLS Delivered Currency Futures Contracts

To facilitate spread trading between currency products where positions held to termination create offsetting currency payment obligations, the Clearing House may net to the extent possible physical delivery payment obligations by clearing member customer by currency, in accordance with the procedures outlined in the Clearing House Manual of Operations. Clearing members desiring netting of obligations may only net payment obligations that arise from positions belonging to the same beneficial account owner, and shall be required to submit a Delivery Netting Request form, which identifies the final positions and net currency payments of a customer requesting delivery netting, to the Clearing House by 11:00 a.m. on the last day of trading. For U.S. Dollar/ Canadian Dollar or E-micro U.S. Dollar/Canadian Dollar Contracts only, such Delivery Netting Request form shall be submitted to the Clearing House by 10:00 a.m. on the last day of trading. For Turkish Lira / U.S. Dollar Contracts such Delivery Netting Request form shall be submitted to the Clearing House no later than one hour following the termination of trading on the last day of trading.

Clearing members may also net delivery obligations within a given currency following the last day of trading in such eligible currency product, except for U.S. Dollar/ Canadian Dollar, E-micro U.S. Dollar/

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Canadian Dollar or Turkish Lira / U.S. Dollar Contracts. Clearing members may net delivery obligations across all accounts belonging to the same beneficial account owner.

Clearing members are prohibited from netting open positions across customer accounts while a currency contract remains eligible for trading on the Exchange.

Clearing members shall be required to submit a Delivery Netting Request, which identifies the final positions and net currency delivery obligations to the Clearing House by 11:00 a.m. (10:00 a.m. for U.S. Dollar/ Canadian Dollar or E-micro U.S. Dollar/ Canadian Dollar Contracts and no later than one hour following the termination of trading for the Turkish Lira / U.S. Dollar Contracts), on the last day of trading, in accordance with the procedures outlined in the Clearing House Manual of Operations.

743. DELIVERY INFRACTIONS

743.A. Late or Inaccurate Delivery

1. If a clearing member with a Delivery Commitment to pay funds pursuant to Rules 731, 732, 737 or 738 fails to deposit such funds in order to make timely payment on the date required in those rules, the Clearing House may impose a fine upon the clearing member pursuant to the schedule of fines maintained by the Clearing House or any other compensation due to the late or inaccurate delivery.

   If by 9:30 a.m. Chicago time on the day following the date required in Rules 731, 732, 737 and 738, such deposit is not made, the failure shall be deemed a delivery obligation failure of the clearing member and the matter shall be acted upon pursuant to Section B of this Rule.

   Funds deposited pursuant to Rules 731, 732, 737 and 738 earlier than the required date of deposit shall not earn interest for the early time period.

2. If the information contained in either the Buyer's CLS on Non-CLS Delivery Commitment or the Seller's CLS or Non-CLS Delivery Commitment is inaccurate so that delivery cannot be accomplished in a timely manner, fines or damages may be assessed as in Section B below.

743.B. Delivery Obligation Failure

A clearing member with a CLS or Non-CLS Delivery Commitment who fails to perform all acts required by this chapter, or whose actions or inactions have been deemed a delivery obligation failure shall be liable for any loss sustained, which loss shall be computed, without duplication, as follows:

1. The Global Head of Clearing or their designee shall determine the change, if any, from the final settlement price on the last day of trading to the spot rate on the first day on which the transaction could be consummated on the spot market at the earliest time it is determined that such a transaction could be completed.
2. The related charges suffered by the other party at any of its designated banks, the related charges suffered by the Clearing House and any financial performance paid by the Clearing House pursuant to Rule 702.
3. A sum not to exceed 1% of the U.S. dollar value of the contract. Such amount shall be set by the Global Head of Clearing or their designee, acting in their sole discretion, and shall be binding upon both parties to the contract, except no such sum shall be assessed where a delivery obligation failure is occasioned by the circumstances delineated in Rule 701.

743.C. Final Settlement in Delivery Obligation Failure

Upon notification to the Clearing House of a paired foreign currency delivery obligation failure in accordance with Rule 702, in order to better ensure settlement finality, automatically and without any further action the following shall occur simultaneously with respect to each such failure:

1. The defaulting clearing member and Affected Clearing member shall be released from their original paired currency delivery obligations to each other;
2. The Clearing House shall be deemed to have entered into a contract with the Affected Clearing Member on terms consistent with the failed contract the Affected Clearing Member had with the defaulting clearing member (“Temporary Contract”);
3. The Clearing House and Affected Clearing Member shall be deemed to have entered into a contract with obligations that are opposite to those of the Temporary Contract (“Termination Swap”); and
4. The Clearing House’s and Affected Clearing Member’s obligations under the Temporary Contract and the Termination Swap will completely offset and net such that the parties shall have no obligation to deliver currencies to each other.

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Notwithstanding the provisions above, a clearing member that fails to fully perform its paired foreign currency delivery obligation remains liable for losses and damages as provided in Rules 714 and 743.B.

744.-759. [RESERVED]

OTHER COMMODITIES

760. DELIVERY PROCEDURES IN OTHER COMMODITIES

All other commodities which do not have delivery provisions specified in this chapter shall be governed by the requirements of the relevant contract specification chapter.

761.-769. [RESERVED]

ALTERNATIVE DELIVERY PROCEDURES

770. DELIVERY OBLIGATION TRANSFER PROCEDURES

A clearing member that carries a futures position in a physically delivered contract that has expired as the result of any party's error, omission or outtrade discovered on or after the last day of trading may, with the consent of the account owner(s) or controller(s), transfer such position to an account with different beneficial ownership; provided, however, that the parties to an error or outtrade must exercise the utmost diligence to resolve the error or outtrade.

Notice of delivery obligation transfers must be made to the Clearing House. Such transfers require that the Clearing House receive acceptance from an account(s) with different beneficial ownership and confirmation of the agreed upon transfer by the initiating party. Such confirmation must be submitted in writing on the form specified by the Clearing House. All positions transferred pursuant to this Rule shall take place at the final settlement price of the contract; however this requirement does not prohibit cash adjustments between the parties to the transfer.

Clearing member firms representing accounts that have transferred a trade pursuant to this Rule must correctly report the change in open interest to the Clearing House pursuant to the schedule established by the Exchange.

In the event a delivery obligation transfer notification does not result in a trade transfer, delivery shall take place as required under Exchange rules.

Nothing in this Rule relieves a clearing member of its responsibilities with respect to open positions in an expiring contract month in a physically delivered contract as set forth in Rule 716.

771. ALTERNATIVE NOTICE OF INTENTION TO DELIVER

A seller and buyer matched by the Exchange may agree to make and take delivery under terms or conditions which differ from the terms and conditions prescribed by this Chapter, and the applicable chapter which contains the contract specifications for the products being delivered, and such other requirements as the Exchange may prescribe.

In such instances, matched clearing members shall execute an Alternative Notice of Intention to Deliver ("ANID") in the form and manner prescribed by the Exchange and shall deliver a completed and executed copy of such notice to the Exchange. The delivery of an executed ANID to the Exchange shall release the clearing members and the Exchange from their respective obligations under the rules of this Chapter and any other Exchange rules and requirements regarding physical delivery.

In executing such notice, clearing members shall indemnify the Exchange against any liability, cost, or expense the Exchange may incur, for any reason, as a result of the execution, delivery or performance of such contract or such agreement, or any breach thereof or default thereunder. Upon receipt of an executed ANID, the Exchange will return to the clearing members all margin monies held for the account of each with respect to the contracts involved.

772.-779. [RESERVED]

SECURITY FUTURES PRODUCTS

780. SECURITY FUTURES PRODUCTS

Deliveries of Security Futures Products effected on a Marketplace apart from the Chicago Mercantile Exchange and cleared by the Clearing House per the provisions of Chapter 8-B shall be governed as

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set forth herein.

781. DELIVERY OF UNDERLYING SECURITIES

At maturity of a physically-settled stock future, in addition to the final variation payment (if any), the Clearing Member that is, or that represents, the seller shall be obligated to deliver, and the Clearing Member that is, or that represents, the buyer shall be obligated to receive and pay for, a quantity of the underlying security equal to the unit of trading at the aggregate purchase price.

782. DESIGNATION OF DELIVERY FACILITIES

Clearing Members shall be required to designate a clearing member of the Options Clearing Corporation (OCC) who is also a member of the Depository Trust Clearing Corporation (DTCC) to facilitate deliveries of physically-settled stock futures. Such designations shall be made through the execution of such agreements and per such procedures as the Clearing House may designate from time to time. Settlement of the obligations to deliver and pay for such underlying securities shall be effected in accordance with the provisions of the OCC and DTCC. The parties to such delivery shall bear the costs associated with such delivery per the provisions of the OCC and DTCC.

783. [RESERVED]

784. FAILURE TO PERFORM

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Chapter 8
Clearing House and Performance Bonds

GENERAL

800. CLEARING HOUSE

The Exchange shall maintain and operate a Clearing House in order to protect market participants and to maintain the integrity of the contracts traded on or processed through the Exchange. Membership in the Clearing House shall be a right and privilege granted by the Board of Directors which may, from time to time, establish such classes of membership in the Clearing House, together with the duties, rights and privileges thereof, as it deems necessary. Whenever these rules create a right in favor of the Clearing House, or impose a liability on the Clearing House, it shall be construed as the right or liability of the Exchange, and shall be enforced by or against the Exchange.

For purposes of these Chapter 8 rules and except as otherwise noted within a particular rule, all references to requirements, conditions or procedures of the Clearing House, shall be deemed to apply to contracts traded on or subject to the rules of an FBOT identified in Rule 8C04; the term “foreign futures” refers to futures and options on futures traded on or subject to the rules of such FBOT; and such FBOT is not a Participating Exchange.

For purposes of these Chapter 8 rules, each of the following constitutes a separate account class: (i) futures positions executed on or subject to the rules of an exchange that is registered with the CFTC as a designated contract market and performance bond amounts or other collateral held in an account consistent with section 4d(a) of the CEA and CFTC Regulations thereunder, along with any swaps or foreign futures positions and performance bond amounts or other collateral for such positions held in such account (“futures account class”); (ii) foreign futures positions and performance bond amounts or other collateral held in an account consistent with the CFTC Part 30 Regulations (“foreign futures account class”); and (iii) swap positions held in an account consistent with the CFTC Part 22 Regulations, along with any futures positions or foreign futures positions and performance bond amounts or other collateral for such positions held in such account (“cleared swaps account class”).

Each account class is further divided into a customer class and a proprietary class. The Clearing House will hold customer positions of an FCM Clearing Member (i) in the futures account class, in segregated accounts protected under CFTC Regulation 1.20; (ii) in the foreign futures account class, in accounts protected under CFTC Regulation 30.7 (“secured accounts”); and (iii) in the cleared swaps account class, in cleared swaps customer accounts protected under the CFTC Part 22 Regulations.

801. MANAGEMENT

The Board has governance and oversight responsibility of the safety and efficiency of the Clearing House. With respect to the governance and oversight of the Clearing House, the responsibilities of the Board include approving the appointments of the Global Head of Clearing and Chief Risk Officer of the Clearing House. The Board also has created the Clearing House Oversight Committee, which also has governance and oversight responsibility relating to the Clearing House as set forth in its written Charter. The Global Head of Clearing shall be responsible for the daily operation of the Clearing House and the implementation of the rules applicable to the Clearing House. The Chief Risk Officer shall be responsible for implementing the risk management framework and its procedures, policies and controls and for making appropriate recommendations to the Board, the Clearing House Oversight Committee or relevant risk committees, as applicable, regarding the Clearing House's risk management functions. The Global Head of Clearing and the Chief Risk Officer of the Clearing House may also delegate authority for certain aspects of their responsibilities to staff of the Clearing House. Clearing House staff shall adopt, establish, publish and amend from time to time a Clearing House Manual of Operations ("Manual"). This Manual shall contain, among other things, information and directions for preparing trade data, completing prescribed memoranda and meeting other Clearing House requirements. The Manual and amendments thereto shall constitute part of the rules of the Exchange.

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802. PROTECTION OF CLEARING HOUSE

802.A. Default by Base Clearing Member or Other Participating Exchanges

The Clearing House shall establish a guaranty fund (the "Base Guaranty Fund") for products other than IRS Products and any positions commingled with IRS Contracts pursuant to Rule 8G831 (such products, the "Base Guaranty Fund Products"). Each Base Clearing Member shall contribute to the Base Guaranty Fund in accordance with the requirements of Rule 816. A Base Clearing Member's Base Guaranty Fund contribution may be applied by the Clearing House in accordance with this Rule 802 to mitigate a Loss (as defined below) to the Clearing House attributable to cleared Base Guaranty Fund Products.

1. Default by Base Clearing Member

If a Base Clearing Member of CME, CBOT, NYMEX, COMEX, or an OTC Clearing Member (i) fails promptly to discharge any obligation to the Clearing House or (ii) becomes subject to any bankruptcy, reorganization, arrangement, insolvency, moratorium, or liquidation proceedings, or other similar proceedings under U.S. federal or state bankruptcy laws, any comparable non-U.S. laws, or other applicable law, the Clearing House may declare such Base Clearing Member to be in default. The Clearing House will post notice of a default declaration on CME Group Inc.'s public website. For purposes of this Rule 802, each default by a Base Clearing Member will be considered a separate default event, provided that if a Base Clearing Member has been declared in default, subsequent failures to pay by such defaulting Base Clearing Member shall not be considered separate default events unless and until the original default has been fully resolved and such Base Clearing Member has been restored to good standing.

Upon a default, the Clearing House shall act promptly to mitigate any loss caused by such default. The Clearing House may engage in any commercially reasonable transaction or action contemplated by the Rules and the Base Default Management Guidelines to manage, reduce, or eliminate the risk created by the default, including but not limited to, entering into hedges, liquidating positions in the market, auctioning or selling a portion or all of the portfolio of the defaulting firm and, if applicable, its customers, and combining or offsetting by book-entry positions in eligible accounts of one or more defaulters. The Clearing House shall maintain plans for managing the default of a Base Clearing Member (including but not limited to the Base Default Management Guidelines). A Base Clearing Member that clears or plans to clear Base Products at the Clearing House may obtain a copy of the Base Default Management Guidelines on a confidential basis.

With respect to each hedging or liquidation transaction in a contract that the Clearing House executes via book-entry, the provisions in the second paragraph of Rule 804 shall apply as if there were a substitution.

2. Defaulting Base Clearing Member's Collateral

Upon the default of a Base Clearing Member, Base Collateral shall be applied by the Clearing House to discharge any loss to the Clearing House associated with such default (a "Loss"). A Loss shall include, but shall not be limited to, costs associated with the liquidation, transfer and managing of Base Contracts of the defaulted Base Clearing Member, hedging costs and other costs incurred by the Clearing House related to managing the risk surrounding the default of the Base Clearing Member. The defaulting Base Clearing Member shall take no action, including but not limited to, attempting to obtain a court order that would interfere with the ability of the Clearing House to so apply such assets and proceeds.

If the Base Guaranty Fund contribution, performance bond relating to Base Guaranty Fund Products and other assets of a defaulted Base Clearing Member available to the Clearing House are insufficient to satisfy all of its obligations to the Clearing House, including all claims against the Clearing House by reason of its substitution for that Base Clearing Member pursuant to Rule 804 or Rule 8F05, the Clearing House shall nonetheless pay all such claims, which payments by the Clearing House shall be deemed a Loss to it (hereinafter "Loss") and which shall be a liability of the defaulting Base Clearing Member to the Clearing House, which the Clearing House may collect from any other assets of such Base Clearing Member or by process of law.

A Loss arising in the defaulted Base Clearing Member's proprietary account class shall be satisfied from the Base Collateral. A Loss resulting from any cleared swaps customer's cleared swap position in a Base Product held in a cleared swaps account shall be satisfied by

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application of performance bond, excess performance bond, other collateral and settlement variation gains held for the respective cleared swaps customer consistent with Part 22 of the CFTC's regulations (collectively, "Base Swap Customer Collateral"). A Loss resulting from any customer's position in any futures held in a futures segregated account, or any swap position in a Base Product or foreign futures position that is commingled with such futures positions in such segregated account, shall be satisfied by application of performance bond, excess performance bond, other collateral and settlement variation gains held in the Base Clearing Member's customer account in a manner consistent with section 4d(a) of the CEA and CFTC Regulation 1.20 (collectively, "Base Futures Customer Collateral").

A Loss resulting from any customer's position in any foreign futures held in a secured account shall be satisfied by application of performance bond, excess performance bond, other collateral and settlement variation gains held in the Base Clearing Member's customer account in a manner consistent with Commission Regulation 30.7 (collectively, "Base Futures 30.7 Customer Collateral").

For purposes of this Rule, the positions in the cross-margin account of a Participating Clearing Member or its Cross-Margining Affiliate at a Cross-Margining Clearing Organization, and the performance bond thereon, shall be considered assets of the Participating Clearing Member available to the Clearing House to the extent provided in the Cross-Margining Agreement between the Clearing House and such Cross-Margining Clearing Organization. A Base Clearing Member in default shall immediately make up any deficiencies in its Base Guaranty Fund contribution resulting from such default and in any event no later than the close of business on the banking day following demand by the Clearing House.

3. Default by Other Participating Exchanges or Partner Clearinghouses

If a Participating Exchange or Partner Clearinghouse fails to promptly discharge any obligation to the Clearing House arising out of its obligations to the Exchange, such Participating Exchange's or Partner Clearinghouse's letters of credit, performance bonds and other assets available to the Clearing House shall be applied by the Clearing House to discharge the obligation, pursuant to the procedures set forth below in Rule 802.A.5 with respect to a defaulting Base Clearing Member. If such resources are insufficient to satisfy the Participating Exchange's or Partner Clearinghouse's obligations to the Clearing House, the deficiency shall be considered a Loss that is subject to satisfaction pursuant to Rule 802.B.

4. The Base Guaranty Fund

The Base Guaranty Fund shall be composed of the required Base Guaranty Fund contributions of Base Clearing Members pursuant to Rule 816, or any comparable security deposit contributions from a Participating Exchange or Partner Clearinghouse.

5. Application of Defaulting Base Clearing Member's Collateral

Upon a default, the Clearing House shall apply the defaulting Base Clearing Member's collateral to the deficiency.

i. Allocation of Assets. Subject to the provisions of 802.G, as of the cycle in which the default occurs, the Clearing House shall allocate assets of the defaulting Base Clearing Member as follows: (a) the defaulting Base Clearing Member's Base Guaranty Fund requirement (b) the defaulting Base Clearing Member's required performance bond amounts as of the prior clearing cycle, (c) any CME shares (whether common shares or class B shares) or any cash posted in lieu of such shares, and (d) any of the defaulting Base Clearing Member's other assets held by, pledged to or otherwise available to the Clearing House, including any amounts from IRS Products made available to the Base Guaranty Fund pursuant to Rule 8G802.D.

ii. Management of Obligations for Cycle of Default. As of the cycle in which the default occurs, the Clearing House shall aggregate the following assets of the defaulting Clearing Member: any excess Base Guaranty Funds, any excess performance bond from the prior clearing cycle, any partial payment by the Base Clearing Member for the default cycle, and any other available assets of the Base Clearing Member. Such unassigned assets shall be allocated first to any net settlement variation payment obligation of the defaulting Base Clearing Member to the Clearing House, pro rata across the customer and proprietary classes relative to the net settlement variation payment obligation for each account class. If the unassigned funds are not sufficient to satisfy the Base Clearing Member's settlement variation payment obligations for the default cycle, then the remaining settlement variation payment

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obligations for such clearing cycle shall be satisfied only from the assets allocated pursuant to 802.A.5.i. If the Clearing House is unable to satisfy a settlement variation payment obligation from such assets, the deficiency shall be a Loss that the Clearing House shall satisfy pursuant to the procedures in Rule 802.B.

iii. Payment Obligations as Losses are Finalized. During any subsequent clearing cycles in which the Clearing House is managing and/or liquidating open positions in respect of the defaulting Base Clearing Member, the Clearing House shall satisfy any settlement variation payment obligations owed by the defaulting Base Clearing Member to the Clearing House, or other realized losses of or expenses to the Clearing House with respect to the default only from the assets allocated pursuant to 802.A.5.i. Any settlement variation gain to the defaulting Base Clearing Member during such subsequent clearing cycles shall be added to collateral pursuant to 802.A.5.i. The Clearing House shall apply such collateral to such payment obligations for all account classes, giving priority to customer account classes (i.e., customer accounts over proprietary accounts). If the Clearing House is unable to satisfy a settlement variation payment obligation to the Clearing House, or other realized loss or expense to the Clearing House, from the defaulting Base Clearing Member's collateral as set forth in this paragraph, the deficiency shall be a Loss that the Clearing House shall satisfy pursuant to the procedures in Rule 802.B. For the avoidance of doubt, as set forth in 802.G, the Clearing House shall not use performance bond amounts or other collateral in any customer account class of the defaulting Base Clearing Member to satisfy a payment obligation to the Clearing House in respect of the defaulting Base Clearing Member's proprietary account, and shall not use performance bond amounts or other collateral held in one account class for customers of the defaulting Base Clearing Member to satisfy a payment obligation to the Clearing House in respect of another account class for customers of the defaulting Base Clearing Member.

Any gains or excess collateral within a segregated customer account class following final determination of the defaulting Base Clearing Member's losses shall remain segregated to the relevant customer account class, where it may be used to satisfy payment obligations arising from such account class, but shall not be added to the Base Clearing Member's collateral generally.

Any remaining unsatisfied obligations of the defaulting Base Clearing Member shall become Losses to the Clearing House that shall be satisfied as set forth below.

802.B. Satisfaction of Clearing House Obligations

If the Clearing House is unable, using the defaulting Base Clearing Member's collateral as set forth in Rule 802.A, to satisfy all of the Base Clearing Member's obligations to the Clearing House then such obligations shall be met and made good promptly by the Clearing House pursuant to this Rule 802.B. Such obligations include, but shall not be limited to, costs associated with the liquidation, transfer and managing of positions, arising out of: 1) its substitution (pursuant to Rule 804 or Rule 8F05) for a defaulting Base Clearing Member a defaulting Participating Exchange, or a defaulting Partner Clearinghouse; 2) a shortfall in a cross-margining program; 3) the failure of a depository, exchange or market apart from the Exchange but whose transactions are cleared pursuant to the provisions of Chapters 8B, 8C or 8F; or 4) any other cause. All of the foregoing shall be deemed Losses to the Clearing House. Losses shall be satisfied by the Clearing House in the order of priority hereafter listed. Non-defaulting Base Clearing Members shall take no actions, including but not limited to attempting to obtain a court order, that would interfere with the ability of the Clearing House to collect and apply assets and proceeds in accordance with this Rule 802.B. For purposes of this Rule 802.B, a default by a Participating Exchange or a Partner Clearinghouse shall be managed in the same manner as a default by a clearing member.

1. If the Base Collateral and the Base Customer Collateral, as applicable, are insufficient to cover the Loss produced by the default, the Clearing House shall cover, or reduce the size of, such Loss by applying the following funds to such losses in the order of the Base Priority of Payments, as follows:

i. The corporate contribution of CME, which shall equal $100,000,000 (the "CME Contribution").

ii. The Base Guaranty Fund.

iii. The Guaranty Fund contributions of non-defaulting Base Clearing Members, applied in the following manner:
   a. The Base Guaranty Fund contribution of Subordinated Bidders equal to the relevant

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Aggregate Subordinated Amounts of such Subordinated Bidders applied on a pro rata application pursuant to this sub-section (a).

b. the (remaining Base Guaranty Fund of all other Base Clearing Members (excluding an amount of the Base Guaranty Fund of each Winning Bidder equal to the Final Aggregate Seniorized Amounts for such Winning Bidders) will be applied pro rata until the entire loss is allocated; then, to the extent not all losses have been applied after application pursuant to this subsection (b);
c. the (remaining) Base Guaranty Fund of all Winning Bidders, which is equivalent to the Final Aggregate Seniorized Amount, will be applied pro rata.

As used in this Rule 802.B:

"Aggregate Subordinated Amount" means the sum of all subordinated amounts as determined by the Clearing House in accordance with the Base Default Management Guidelines.

"Final Aggregate Seniorized Amount" means the sum of all seniorized amounts as determined by the Clearing House in accordance with the Base Default Management Guidelines.

"Subordinated Bidder" means in respect of each default management auction, the Mandated Base Clearing Member(s), voluntarily participating Base Clearing Members or Participating Base OTC Clearing Members whose Base Guaranty Fund, contribution is subject to subordination as determined by the Clearing House in accordance with Base Default Management Guidelines. The maximum subordination amount for purposes of this definition shall be the lesser of 100% of:x) the Subordinated Bidder's Guaranty Fund contribution, or y) the defaulted Base Clearing Member's Base Guaranty Fund contribution.

"Winning Bidder" means, in respect of each Defaualt Management Auction, the Base Clearing Member(s) designated as such by the Clearing House with respect to such Default Management Auction.

iv. The balance of any Losses remaining after the application of the above funds shall be assessed against all Base Clearing Members (excluding any insolvent or defaulting clearing members). Each Base Clearing Member (excluding any insolvent or defaulting Base Clearing Member) shall be subject to an assessment up to an amount that does not exceed (A) a total of 275 per cent of such Base Clearing Member's Base Guaranty Fund requirements at the time of the default with respect to Losses attributed to a single defaulted Base Clearing Member and (B) a total of 550 per cent of such Base Clearing Member's Base Guaranty Fund requirements at the time of the default with respect to Losses attributed to all defaulted Base Clearing Members during a Base Cooling Off Period. Assessed amounts shall be divided among clearing members pro rata in proportion to the size of the Clearing House's assessment authority with respect to each clearing member.

2. [Reserved]

3. [Reserved]

4. [Reserved]

5. Fedwire and Satisfaction of Assessment

All amounts assessed by the Clearing House against a Base Clearing Member pursuant to this Rule, during the hours in which the Federal Reserve's wire transfer system (Fedwire) is in operation, shall be paid to the Exchange by such Base Clearing Member prior to the close of Fedwire on such day (regardless of any local business hours or local holidays in a jurisdiction where a Base Clearing Member is located); provided, however, that all amounts assessed within one (1) hour prior to the close of Fedwire shall be paid to the Exchange within one (1) hour after Fedwire next opens.

Any Base Clearing Member that does not satisfy an assessment, made pursuant to this paragraph 802.B.5 or paragraphs 802.B.1.v, 802.B.2.v, 802.B.3.v, 802.B.4.iv or 802.B.4.v above, shall be in default. Any Loss that occurs as a result of such default shall itself be assessed by the Clearing House to non-defaulting Base Clearing Members pursuant to the applicable paragraph.

If a Base Clearing Member (i) has made payment of all amounts assessed against it pursuant to this Rule 802.B in connection with any single default and any related default by any other Base Clearing Member with respect to its own assessment, (ii) has replenished any deficiency in its Base Guaranty Fund contribution in accordance with Rule 802.F, and (iii) within five (5) business days after making such payments, has satisfied the other conditions for withdrawal

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set forth in Rule 913.A, it may provide written notice of its application to withdraw from clearing membership pursuant to Rule 913. Upon receipt of such notice, provided that the foregoing conditions have been satisfied, the withdrawing Base Clearing Member shall not be subject to any residual assessment to cover Losses for defaults occurring after the related Base Cooling Off Period. Further, the Base Guaranty Fund contribution that it has restored shall not be used or applied towards meeting any claim or obligation of the Clearing House pursuant to Rule 802.B that arises with respect to defaults occurring after the related Base Cooling Off Period, and the withdrawing Base Clearing Member's Base Guaranty Fund contribution shall be released in accordance with Rule 913.

After payment of an assessment pursuant to Rule 802.B, a Base Clearing Member shall charge other clearing members for whom it clears contracts or carries positions on its books to recover their proportional share of the assessment. Such other Base Clearing Members shall promptly pay the charge.

6. Details of Implementation

While adherence to the provisions of this Rule 802.B shall be mandatory, the detailed implementation of the process of finalizing Losses with respect to a default, including the liquidation, auction or sale of positions or assets of the defaulting Base Clearing Member, shall be conducted by the Clearing House in accordance with the Rules and the Base Default Management Guidelines.

In order to ensure that the process for liquidating open commodity contracts results in competitive pricing, to the extent feasible under market conditions at the time of liquidation, liquidation of open commodity contracts held for a house account or customer account of a defaulting Base Clearing Member may occur by one or more of the following methods: (a) book entry that offsets open commodity contracts on the books of the defaulting Base Clearing Member; (b) liquidation in the open market; and/or (c) one or more private auctions amongst qualified market participants invited by the Clearing House to submit confidential bids. The Clearing House shall have discretion to select the best bid submitted for any portfolio in an auction, based on the totality of the circumstances. All information received by a Base Clearing Member, its affiliate or customer in connection with the Clearing House's liquidation and default management processes shall be treated as confidential.

In the event that identical customer commodity contracts are liquidated in the open market on the same date but cannot be liquidated at the same price, unless the Clearing House determines that it would be inappropriate, a weighted average of the liquidation prices for such contracts shall be used in determining the value of the liquidated commodity contracts for each such customer. In the event that open commodity contracts of multiple customers are liquidated in a bulk auction, the net proceeds of such auction shall be allocated on a pro rata basis amongst the affected customers based upon their applicable performance bond requirements for the clearing cycle immediately prior to the default.

7. Modifications of Clearing House's Obligations for Base Contracts

(a) If at any time following a default of a Base Clearing Member, the assets available to cover the default under the preceding sections of Rule 802 are insufficient to satisfy the Loss and obligations of the Clearing House to Base Clearing Members as a result of such default, then the Clearing House shall, in a manner that is consistent with the requirements of the Commodity Exchange Act and the regulations adopted thereunder, conduct its next settlement cycle as described in Rule 802.B.7(b).

(b) The Clearing House shall issue a Clearing Advisory Notice and conduct a settlement cycle to determine settlement prices for all Base Contracts and the net portfolio gain or loss for each Base Clearing Member and its customers, in accordance with the following:

(i) The net portfolio gain of a Base Clearing Member (a "collect"), or the net portfolio loss of a Base Clearing Member to the Clearing House (a "pay") shall be determined separately:

(A) For the Base Clearing Member's proprietary positions in Base Contracts (the net portfolio gain or net portfolio loss for such positions, "Proprietary Base Collects" or "Proprietary Base Pays"),

(B) For a Base Clearing Member that is an FCM, for (i) the futures positions of the Base Clearing Member's customers in Base Contracts held in a futures segregated account and (ii) any swap positions or foreign futures positions of such customers that are commingled with such futures positions in such account (the net portfolio gain or net portfolio loss for such

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positions described in (i) and (ii) collectively, "Customer Futures Collects" or "Customer Futures Pays".

(C) For a Base Clearing Member that is an FCM, for (i) the swap positions in Base Contracts of each customer of the Base Clearing Member held in a cleared swaps customer account for such customer and (ii) any Commingled Futures Positions (as such term is defined in Rule 8G831) for each customer (the net portfolio gain or net portfolio loss for such swap positions and Commingled Futures Positions described in (i) and (ii) collectively, "Individual Customer Swap Collects" or "Individual Customer Swap Pays").

(D) For a Base Clearing Member that is an FCM, for the foreign futures positions of the Base Clearing Member's customers held in a secured account (the net portfolio gain or net portfolio loss for such positions, also the "Customer Futures Collects" or "Customer Futures Pays," provided, however, that the Clearing House will determine the Customer Futures Collects and Customer Futures Pays separately for a Base Clearing Member's futures account class and foreign futures account class.

(ii) The Clearing House Oversight Committee (after considering any recommendation of the Emergency Financial Committee) may determine a maximum amount of position liquidation payments that may be included in the Aggregate Base Collects, based upon then existing facts and circumstances, that it deems appropriate to mitigate further disruptions to the markets.

(iii) The Clearing House shall notify each Base Clearing Member of the amount of its remaining Base Assessments, Proprietary Base Pays, Customer Futures Pays and Individual Customer Swap Pays and each Base Clearing Member shall pay all such amounts no later than the time required for the relevant settlement cycle. If a Base Clearing Member does not pay all such amounts to the Clearing House, the Clearing House shall determine such Base Clearing Member to be in default and may take any of the actions specified in Rule 802.A. with respect to such Base Clearing Member and its customers.

(iv) If the amount of Aggregate Base Available Funds received by the Clearing House exceeds the Aggregate Base Collects, the Clearing House shall calculate reimbursements of, and distribute, the excess funds, in reverse order of the utilization of Base Priority of Payments.

(v) If the amount of the Aggregate Base Collects exceeds the amount of Aggregate Base Available Funds received:

(A) the Clearing House shall notify Base Clearing Members and provide an opportunity for Base Clearing Members and their customers to make voluntary contributions to the Clearing House.

(B) If the amount of the Aggregate Base Collects continues to exceed the amount of Aggregate Base Available Funds after the Clearing House adds any voluntary contributions from Rule 802.B.7(b)(v)(A) to the Aggregate Base Available Funds, then the Clearing House shall apply Base Gains Haircuts (as defined below) to the Proprietary Base Collects, Customer Futures Collects and Individual Customer Swap Collects for the current settlement cycle and each successor settlement cycle on the current Business Day and, unless a Bankruptcy Event has occurred, each of the next two Business Days, in accordance with the following:

Proprietary Base Collects, Customer Futures Collects and Individual Customer Swap Collects each shall be reduced on a pro rata basis according to the amount of such collects, to equal the amount of Aggregate Base Available Funds received relative to Proprietary Base Collects, Customer Futures Collects, and Individual Customer Swap Collects (such process, a "Base Gains Haircut").

Customer Futures Collects shall be haircut by the Clearing House at the customer account class level of each Base Clearing Member. Each Base Clearing Member shall allocate the haircut of its Customer Futures Collects pro rata among its customer with net portfolio gains for the relevant settlement cycle;

(C) The Clearing House Oversight Committee may instruct the Clearing House to extend or reduce the number of days during which Base Gains Haircuts are applied by one or two Business Days, provided that in no circumstance may the Clearing House conduct settlement cycles in which Base Gains Haircuts are applied for longer than five Business Days. Before providing such instruction, the Clearing House Oversight Committee must consider any recommendation of the Emergency Financial Committee. Any recommendation of the Emergency Financial Committee and the decision of the Clearing House Oversight Committee, each regarding adjusting the duration of settlement cycles with Base Gains Haircuts, must be based upon then existing facts and circumstances, be in furtherance of the integrity of the

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Clearing House and the stability of the financial system, and take into consideration the legitimate interests of Base Clearing Members and market participants;

(D) For each settlement cycle conducted in accordance with this subparagraph (v), absent a Bankruptcy Event, the Clearing House shall pay the haircut Proprietary Base Collects, Customer Futures Collects, and Individual Customer Swap Collects to Base Clearing Members as soon as practicable after receipt of the Aggregate Base Available Funds. Subject to applicable law, the Clearing House will make arrangements to pay the customers of a defaulted Base Clearing Member; and

(E) If a Bankruptcy Event occurs following a default of a Base Clearing Member on a day during which Base Gains Haircuts are applied to settlement cycles, on the day of the Bankruptcy Event, the Clearing House shall conduct a final settlement cycle which shall be subject to a Base Gains Haircut. The price determined in accordance with such settlement cycle shall be used as the price for a Base Contract when netting and closing out pursuant to Rule 818.

8. Base Partial Tear-Ups and Base Full Tear-Ups

(a) The Clearing House may, at any time following a default of a Base Clearing Member, notify Base Clearing Members and provide an opportunity for Base Clearing Members to voluntarily agree to have their proprietary positions or, with a customer's consent, to agree to have each such customer's positions, extinguished by the Clearing House.

(b) If proprietary or customer positions in Base Contracts of a defaulted Base Clearing Member remain open (the "Remaining Open Base Positions") following the last settlement cycle conducted pursuant to Rule 802.B.7(b)(v), the Clearing House shall extinguish the Remaining Open Base Positions through a partial tear-up process ("Base Partial Tear-Up") or a full tear-up process ("Base Full Tear-Up") of proprietary and customer positions of non-defaulted Base Clearing Members and non-defaulted customers of the defaulted Base Clearing Member in accordance with the following:

(i) The Clearing House Oversight Committee shall determine the appropriate scope of each Base Partial Tear-Up or shall determine that a Base Full Tear-Up is appropriate. Before making such determination, the Clearing House Oversight Committee must consider any recommendation of the Emergency Financial Committee. Any recommendation of the Emergency Financial Committee and each determination of the Clearing House Oversight Committee made for purposes of this Rule 802.B.8 must:

(A) be based upon then existing facts and circumstances;

(B) be in furtherance of the integrity of the Clearing House and the stability of the financial system;

(C) take into consideration the legitimate interests of Base Clearing Members and market participants; and

(D) aim to extinguish Remaining Open Base Positions and any additional positions in Base Contracts deemed necessary to mitigate further disruptions to the markets affected by the Remaining Open Base Positions.

(ii) A Base Partial Tear-Up may include, but need not be limited to, the following methods:

(A) Line-by-Line Tear-Up Against the Remaining Open Base Positions.

Proportionately extinguish Base Contracts held by non-defaulted Base Clearing Members, their non-defaulted customers and the non-defaulted customers of the defaulted Base Clearing Member that are opposite to the Remaining Open Base Positions and relative to the size of the Remaining Open Base Positions; and

(B) Tear-Up of All Positions in Base Contracts within a Product or Combination of Products. Extinguish all open positions in Base Contracts for a product or combination of products.

(iii) A Base Full Tear-Up would involve the extinguishment of all open positions in Base Contracts.

(c) In connection with any settlement cycle with Base Gains Haircuts, the Clearing House Oversight Committee may instruct the Clearing House to extinguish a portion of the Remaining Open Base Positions through a Base Partial Tear-Up of proprietary and customer positions of non-defaulted Base Clearing Members and non-defaulted customers of the defaulted Base Clearing Member. The Clearing House Oversight Committee would determine the appropriate scope of each such Base Partial Tear-Up in accordance with the procedures set forth in Rule

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802.B.8(b)(i) and (ii), except that each reference to "Remaining Open Base Positions" shall mean the relevant portion of Remaining Open Base Positions.

9. Limited Recourse for Base Guaranty Fund Products

If a default occurs, Base Collateral, Base Customer Collateral and the Base Priority of Payments shall be the sole source of payments to cover the Loss until the default is fully and finally resolved, as applicable. In the event the Base Collateral, Base Customer Collateral and the Base Priority of Payments are insufficient to cover the Loss, regardless of whether the CME is able to require a Base Clearing Member to cure a deficiency in the Base Guaranty Fund because of the occurrence of a Bankruptcy Event (as such term is defined in Rule 818.A.), Base Clearing Members and the holders of Base Contracts shall have no recourse to any other funds or any other entity, including without limitation the guaranty funds that support clearing of other products, CME, CME Group Inc. or any of its affiliates, other than any amounts recovered as described in Rule 802.E.

10. No Claims Against the Exchange or Clearing House

(a) Base Clearing Members, their affiliates and their customers shall have no claim against the Exchange, CME Group Inc. or any affiliates of the Exchange or CME Group Inc., or any directors, officers or employees of any of the foregoing, including but not limited to claims against any other guaranty fund established by the Exchange, CME Group Inc. or any of its affiliates with respect to losses suffered as a result of the application of any provision in this Rule 802.B. No beneficial holder of a Base Contract shall have any claim against its non-defaulted Base Clearing Member as a result of the application of this Rule 802.B. other than any amounts recovered as described in Rule 802.E.

(b) Notwithstanding anything in subparagraph (a), Base Clearing Members, for both their proprietary positions in Base Contracts and their customers' positions in Base Contracts, and non-defaulted customers of defaulted Base Clearing Members will have a claim on any recovery from the defaulted Base Clearing Member or the estate of the defaulted Base Clearing Member in the amount of the Base Gains Haircuts, in the aggregate, applied to such positions (such amount with respect to all non-defaulted Base Clearing Members and their customers and the non-defaulted customers of the defaulted Base Clearing Member, "Aggregate Base Gains Haircuts"), as set forth more fully in Rule 802.E. If the recovery from the defaulted Base Clearing Member is less than the Aggregate Base Gains Haircuts, non-defaulted Base Clearing Members and their customers and the non-defaulted customers of defaulted Base Clearing Members will share pro rate in the recovery.

11. Non-Petition

No Base Clearing Member and no customer of a Clearing Member shall institute against, or join any other person in instituting against, the Exchange any bankruptcy, reorganization, arrangement, insolvency, moratorium, liquidation or examinership proceedings, or other similar proceedings under U.S. federal or state bankruptcy laws or other applicable law arising out of any claimed default by the Clearing House on a Base Contract as a result of the extinguishment of such Base Contract and related payments in accordance with these Rules.

802.C. Application of Funds to Avoid Clearing House Insolvency

If at any point following a default, the Clearing House will be unable to timely fulfill its obligations following application of the funds described above in the priority described above, such that the Clearing House is in imminent danger of defaulting on its obligations or being declared insolvent, then the Clearing House shall be entitled to apply to such obligation any available funds from the defaulting Base Clearing Member's collateral, the CME Contribution, or the Base Guaranty Fund, in the foregoing order of priority, if necessary to avoid a default by the Clearing House or a declaration of its insolvency. Such use of funds may only be made (i) if the Clearing House reasonably concludes that there is a reasonable expectation that (A) the use of such funds will satisfy the immediate obligation and avoid a default or insolvency and (B) that the remaining funds in the overall financial safeguards package (including assessment powers) will be sufficient to satisfy the finalized Losses, and (ii) the Clearing House reaches such conclusion in consultation with the Clearing House's primary regulator as to the specific facts, circumstances and estimates of Losses supporting such conclusion. In such case, the Clearing House shall restore the funds so employed to the CME Contribution segments, or the Base Guaranty Fund from which they were drawn promptly following receipt by the Clearing House of assessment payments or any other amounts that become available to it in respect of obligations arising out of the defaulted Base Clearing Member's default.

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802.D. Utilization of Remaining Base Collateral of Defaulted Base Clearing Member; Restoration of Funds Following Final Determination of Losses

1. After the default of a Base Clearing Member is finally resolved, excess Base Collateral of the Base Clearing Member may be used by the Clearing house for losses to the Clearing House of such clearing member for IRS Products on a pro rata basis based on the amount of any unresolved losses for such product classes.

2. If after the default of a Base Clearing Member is finally resolved, the Clearing House determines that collateral of the defaulting Base Clearing Member, the CME Contribution, the Base Guaranty Fund, or assessment powers were employed in a manner different from what would have occurred had all assets been secured and liquidated immediately and all Losses finalized simultaneously, then the Clearing House shall make appropriate distributions to the non-defaulting firms whose Base Guaranty Funds were applied or who were assessed.

802.E. Rights of Exchange for Recovery of Loss

Losses caused by the default of a Base Clearing Member, Participating Exchange or Partner Clearinghouse are amounts due to the Clearing House from such Base Clearing Member, Participating Exchange or Partner Clearinghouse and shall remain legal obligations thereof notwithstanding the Clearing House's recourse to the loss-mutualization provisions of this Rule 802, and the Clearing House shall take commercially reasonable steps to recover (including claims submitted in an insolvency or resolution proceeding) such amounts. If any portion of these amounts is subsequently recovered by the Exchange, the net amount of such recovery shall be credited to non-defaulted Base Clearing Members (whether or not they are still clearing members at the time of recovery) in the following order on a pro rata basis based on (1) the amount of their (and their customers', if applicable) voluntary contributions with respect to such default, (2) the amount of their (and their customers', if applicable) Aggregate Base Gains Haircuts with respect to such default, (3) the amount of their Base Assessments utilized by the Clearing House with respect to such default, and (4) the amount of their guaranty fund contribution utilized by the Clearing House with respect to such default, each in the order listed, and then to the Exchange for the amount of the CME Contribution utilized by the Clearing House with respect to such default.

802.F. Guaranty Fund Contributions to be Restored

In the event it shall become necessary to apply all or part of the Base Guaranty Fund contributions to meet obligations to the Clearing House pursuant to this Rule 802, Base Clearing Members shall restore their contribution to the Base Guaranty Fund to previously required level prior to the close of business on the next banking day.

802.G. Default Management Across Account Classes

The procedures set forth in 802.A and 802.B shall be conducted separately by the Clearing House with respect to open positions and associated performance bond contributions for different account classes (futures, foreign futures and cleared swaps). Upon a default, the Clearing House may, in accordance with applicable law, act immediately to attempt to transfer to alternate Base Clearing Members part or all customer positions and associated collateral with respect to any customer account class in which there is no default on payment obligations or shortfall in required collateral, and in such cases the Clearing House shall not apply segregated customer collateral to any payment obligations or Losses arising from a default in any proprietary account or a different customer account class.

1. If a default occurs in a customer futures account, the Clearing House has the right to liquidate and apply toward the default all open positions and customer performance bond deposits in the futures account class of the defaulting Base Clearing Member. Accordingly, positions and performance bonds deposited by customers not causing the default are at risk if there is a default in the futures account class of their Base Clearing Member. If the Clearing House liquidates positions and/or collateral in the futures account class, any collateral remaining after application to Losses in respect of such account class shall be reserved to the futures account class in order to satisfy the claims of non-defaulting customers in accordance with applicable law. If the Clearing House liquidates positions and/or collateral in the foreign futures account class, any collateral remaining after application to Losses in respect of such account class shall be reserved to the foreign futures account class in order to satisfy the claims of non-defaulting customers in accordance with applicable law.

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2. In order to minimize disruptions and loss to its public customers if a Base Clearing Member defaults, each Base Clearing Member shall cause its cleared swaps customers to establish arrangements to directly make all required performance bond and settlement variation payments directly to the Clearing House and to keep current and on file with the Clearing House any direction to transfer its open positions and collateral to another Base Clearing Member.

3. The Clearing House shall treat positions and collateral of the cleared swaps customers of a Base Clearing Member, which has been declared to be in default, in accordance with Part 22 of the CFTC's regulations. Immediately after the default of a Base Clearing Member, the Clearing House shall cease netting settlement variation among the cleared swaps customers of the defaulted Base Clearing Member.

4. If the Clearing House ceases to net settlement variation margin of the customers of a defaulted Base Clearing Member, the Clearing House will calculate the settlement variation margin obligation owed to each cleared swaps customer ("collects"), and also calculate the settlement variation margin obligation owed to the Clearing House by each cleared swaps customer ("pays"). The Clearing House will establish a holding account for settlement variation margin collects owed to each cleared swaps customer or, subject to necessary approvals, pay such settlement variation margin collects directly to each cleared swaps customer. The Clearing House will collect cleared swaps customer settlement variation margin pays from the following sources:

(i) Directly from the obligated cleared swaps customer in accordance with the arrangements established pursuant to 802.G.2 or by attaching any excess collateral attributable to that customer;

(ii) By means of liquidating the collateral supporting the cleared swaps customer's position attributed to a cleared swaps customer that fails to make a required settlement variation payment when due. The proceeds of such liquidation shall be used to meet the cleared swaps customer's settlement variation pay obligation to the clearing house. (If the collateral is liquidated, the positions supported by the collateral shall be promptly liquidated.);

Any unmet cleared swaps customer obligation to the Clearing House will be a "Loss," per 802.A.2, and will be cured in accordance with the provisions of 802.B.

5. The Clearing House shall rely on its own books and records to identify the portfolio of rights and obligations arising from the positions of each cleared swaps customer. To the extent the Clearing House's books and records are not available or the Clearing House determines that its books and records are not accurate, the Clearing House shall rely on the information provided by the defaulted Base Clearing Member to identify the portfolio of rights and obligations arising from the positions for each of its cleared swaps customers.

6. Upon liquidating the defaulting Base Clearing Member's proprietary account, any remaining collateral may be applied by the Clearing House to Losses remaining in the defaulting Base Clearing Member's customer account classes. If the defaulting Base Clearing Member has more than one customer account class that has been declared to have defaulted, proceeds from the defaulting Base Clearing Member's proprietary account shall be divided by the Clearing House pro rata among such customer account classes, based on their applicable performance bond requirements for the clearing cycle immediately prior to the default.

802.H. Base Cooling Off Period and Multiple Defaults

The provisions set forth in Rule 802.A and 802.B shall apply with respect to each default by a Base Clearing Member. If more than one Base Clearing Member default occurs at a time or in close sequence, including a default that occurs by reason of a Base Clearing Member's failure to satisfy an assessment demand, the Clearing House shall manage the defaults separately. Upon any default, non-defaulted Base Clearing Members shall be subject to a maximum obligation during the relevant Base Cooling Off Period to contribute to the Base Guaranty Fund and to fund assessments as set forth in Rule 802.B. This maximum shall apply from the date of the original default until the later of (i) the 5th Business Day thereafter and (ii) if another Base Clearing Member defaults during the 5 Business Days following the initial or any subsequent default, the 5th Business Day following the last such default (such period, the "Base Cooling Off Period"), regardless of the number of defaults that occur during such Base Cooling Off Period.

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The aggregate maximum contribution for the Base Cooling Off Period shall be based upon each Base Clearing Member's Base Guaranty Fund requirement and assessment exposure in effect at the commencement of the Base Cooling Off Period. The maximum does not limit clearing members' obligations to restore their Guaranty Fund contributions as set forth in Rule 802.F, except that if the Base Clearing Member's required Guaranty Fund contribution would exceed such maximum, the Base Clearing Member's Base Guaranty Fund requirement shall be reduced accordingly for the remainder of the Base Cooling Off Period. Following a Base Cooling Off Period, the Clearing House shall notify each clearing member of its Base Guaranty Fund deposit obligation and its assessment exposure.

The CME Contribution to the Base Guaranty Fund shall be limited to an aggregate maximum of $100,000,000 during the Base Cooling Off Period. The Board may, at its discretion, authorize additional funds be added to the CME Contribution during the Base Cooling Off Period.

803. LIMITATION OF LIABILITY

The liability of the Clearing House shall be limited to losses resulting from the substitution of the Clearing House upon contracts between clearing members and to losses in connection with substitution of another Participating Exchange for clearing members (i.e., the Mutual Offset System), and to losses in connection with amounts due and owing from a Partner Clearing House. The Clearing House shall not be liable for any other obligations, including but not limited to, obligations of a non-clearing member, obligations of a clearing member to a non-member, obligations of a clearing member to another member of the Clearing House who is acting for them as broker, or obligations to a customer by a clearing member; nor shall the Clearing House become liable to make deliveries to or accept deliveries from a customer of its clearing members.

804. SUBSTITUTION

Except with respect to trades made pursuant to Rules 526, 538 and 853 or as otherwise expressly provided in the Rules, the Clearing House shall, through the process of novation, be substituted as, and assume the position of, seller to the buyer and buyer to the seller of the relevant number of Exchange or Marketplace contracts upon the successful matching of trade data submitted to the Clearing House by the clearing members on the long and short sides of a trade. With respect to contracts that are traded on and matched by another exchange or market, the Clearing House shall be substituted as, and assume the position of, seller to buyer and buyer to seller of the relevant number of such contracts upon matching of trade data submitted to and accepted by the Clearing House.

Upon such substitution, each clearing member shall be deemed to have bought the contracts from or sold the contracts to the Clearing House, as the case may be, and the Clearing House shall have all the rights and be subject to all the liabilities of such member with respect to such transaction. Such substitution shall be effective in law for all purposes.

With regard to trades made pursuant to Rules 526, 538 and 853, the Clearing House shall be substituted at the time payment of the first settlement variation and performance bond due for such trades pursuant to Rule 814 is confirmed by the appropriate settlement bank for both members.

805. OPEN POSITIONS

All contracts for the purchase or sale of any product for future delivery shall remain open and in force, and shall continue to be binding upon the original parties until liquidated by offset as provided in Rule 806 or by delivery or failure to perform as provided in Chapter 7 or until liquidated by the Clearing House in managing the default of a clearing member as contemplated in the Rules..

806. OFFSET PROCESS

When a member buys and sells the same commodity for the same delivery month or a put or call option with the same strike price and expiration month and such contracts are cleared through the Clearing House, the purchases and sales are not automatically offset one against the other. Transactions can only be offset against one another by complying with Rule 811, and, once offset (closed-out), may not subsequently be re-opened at the Exchange.

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807. OPEN LONG POSITIONS DURING DELIVERY MONTH

At such times and in such manner as shall be prescribed by the Manual, clearing members shall submit a complete and accurate record of dates of all open purchases for use in making deliveries. Clearing members shall be fully responsible for inventories submitted to the Clearing House.

This rule shall not apply to trading in options contracts.

808. PROCEDURES FOR TRADE SUBMISSION ON CME CLEARPORT

808.A. Scope of Rule

This Rule governs transactions not competitively executed on the Exchange ("Transactions") that are submitted via CME ClearPort for clearing in connection with a contract that is listed on the Exchange for clearing only or listed for trading and clearing on the Exchange. For purposes of this Rule, the two parties to the Transaction shall be referenced as the "Parties to the Transaction."

808.B. Compliance with Regulatory Exemptions and Exclusions

Each of the Parties to the Transaction shall be responsible for ensuring that, where applicable, the Transaction complies with CFTC regulatory requirements or, in the case of foreign futures, with regulatory requirements in the jurisdiction in which the exchange listing the contracts is located.

808.C. Block Trades or Exchange for Related Position Transactions

The process of submission of a block trade or an exchange for related position Transaction ("EFRP") executed pursuant to Rules 526 or 538, as applicable, shall not be deemed to have been completed unless and until the Parties to the Transaction have successfully concluded the submission of the Transaction to the Clearing House as a block trade or an Exchange of Futures for Physical ("EFP"), an Exchange of Futures for Risk ("EFR") or an Exchange of Options for Options ("EOO"), as applicable, pursuant to the provisions of this Rule and the requirements of Rule 804.

808.D. OTC Derivatives Transactions Submitted for Clearing

CME ClearPort allows for the submission of off-Exchange OTC derivatives Transactions that the Exchange has designated as eligible for clearing only. Such Transactions are subject to the Rules of the Exchange applicable to such cleared-only products.

808.E. Trade Submission Procedures

All Transactions submitted to the Exchange pursuant to this Rule must be submitted in accordance with the procedures established by the Exchange and the Clearing House for this purpose, as amended from time to time. The Parties to the Transaction and any Party authorized under Section F. of this Rule with brokering capability ("Broker" or "Brokers") to submit executed transactions on behalf of Parties to the Transaction to the Exchange shall be responsible, both individually and jointly, for accurately confirming the details of the Transaction to the Exchange. Additionally, Brokers submitting Transactions on behalf of Parties to the Transaction remain responsible for ensuring that such Transactions are accurately and timely submitted in accordance with the requirements of applicable Exchange Rules and requirements of the Clearing House. Once submitted, such transactions may not be modified except in accordance with Section H. of this Rule. The Exchange has no responsibility with respect to the confirmation of trade terms for the Transactions, and the Clearing Members carrying the account of the Parties to the Transaction shall only be responsible for the confirmation required pursuant to Rule 957.

808.F. CME ClearPort Registration Requirements

Each Clearing Member must register with the Exchange in the manner required for any customer authorized by the Clearing Member to submit transactions to the Exchange pursuant to this Rule, and must also register with the Exchange the applicable account numbers for each such customer. For each such account, the Clearing Member carrying that account must also submit to the Exchange the name of any Broker(s) who has registered with the Exchange for services provided by the Exchange, and who is authorized by the customer to act on its behalf in the submission of executed Transactions to the Exchange. For any such Brokers authorized by the customer and submitted to the Exchange by the Clearing Member, such submission by the Clearing Member will not constitute an endorsement or ratification of the

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customer's authorization of the Broker. Moreover, submission of Brokers authorized by the customer will not mean that the Clearing Member is in privity with, has a relationship with and/or is otherwise standing behind any of the customer's authorized Brokers, and the Clearing Member will have no responsibility for any such Brokers selected by the customer and no duty or obligation to supervise the activities of any such Brokers.

808.G. Establishment of Authorized Commodities and Account Risk Limit(s)

With the exception of Interest Rate Swap ("IRS") Transactions, for each account number that has been registered with the Exchange pursuant to Section F. of this Rule, a Clearing Member must also input into the CME Account Manager system an authorization identifying the specific commodities for which a Transaction may be submitted to the Exchange pursuant to this Rule and the account risk limit(s) assigned by the Clearing Member for Transactions for that account.

808.H. Trade Deletion Procedures for Transactions Submitted via CME ClearPort

Following submission of the trade details by Broker (or by Exchange staff as mutually agreed by the Parties to the Transaction), an e-mail will be transmitted to the Parties to the Transaction notifying them that they have been listed as counterparties in a Transaction that has been submitted to the Exchange. Following such submission, a buyer or seller may not unilaterally reject the trade terms previously submitted to the Exchange. However, in order to correct an error resulting from the good faith actions of the Broker or Exchange staff, as applicable, and upon mutual consent of the Parties to the Transaction, Broker or Exchange staff, as applicable, may void the transaction provided, however, that this void response is received by the Exchange within three Business Days of the time of the initial submission of the Transaction to the Exchange. Notwithstanding the provisions of this Section, the Parties to the Transaction and any Broker authorized by the Parties to the Transaction pursuant to Section E. of this Rule may be subject to sanctions pursuant to Rule 512 for the inaccurate, incomplete or untimely submission of the Transactions to the Clearing House.

808.I. Entry of Transactions

For a Transaction submitted to the Exchange pursuant to this rule, such Transaction will first be routed to the Exchange's credit check system. The time of entry of a Transaction into the Exchange's system will be recorded by the system and will be used by the Exchange as the time that a credit check was conducted pursuant to Section J. below.

808.J. Use of Credit Check System

The Exchange will conduct a credit check for each Transaction. The credit check will confirm whether the Clearing Member carrying that account has authorized that account for Transactions submitted pursuant to this Rule in the commodity involved in the Transaction, and confirm whether the entry of the Transaction into clearing would fall within the account risk limit(s) established by the Clearing Member. At all times until both sides (Buy and Sell) of the Transaction have successfully cleared the credit check and the Clearing House has been substituted as the counterparty to the Transaction pursuant to Rule 804, a Transaction submitted to the Exchange pursuant to this rule shall remain as an uncleared Transaction. In the event that either side of the Transaction is rejected as a result of the credit check test, the Parties to the Transaction and their respective Clearing Members will be informed accordingly.

Thereafter, any determination as to further action with respect to the Transaction will be the sole responsibility of the Parties to the Transaction.

808.K. Trade Submission Deadlines

With the exception of IRS and FX Spot, Forward and Swaps Transactions, all other Transactions that are submitted, confirmed and accepted for clearing, as further provided by Section L. of this rule, prior to 5:15 p.m. New York time on an Exchange Business Day will be included by the Exchange for clearing for that Business Day. The Exchange reserves the right to modify these business hours without notice at any time. The CME ClearPort Facilitation Desk will generally be available to assist users 24 hours a day on all Exchange Business Days.

808.L. Clearance by Both Sides of the Transactions of Credit Check

Upon clearance by both sides of the Transaction of the credit check, the Transaction shall be deemed to have been accepted for clearing and will be routed automatically to the Exchange's clearing system. Notwithstanding the above, a Clearing Member shall also be responsible for

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accepting and clearing a position for a Transaction entered into the Exchange's clearing system for clearing following any non-operation of the Exchange's credit check functionality for the applicable account carried by the Clearing Member.

809. TRADE DATA PROCESSING SYSTEM

809.A. Trade Data

Every clearing member must submit accurate trade data for the day's business to the Clearing House no later than the time specified by the Clearing House.

809.B. Matched and Unmatched Trades

The Clearing House shall process all trade data submitted by clearing members but shall accept only those trade records (transactions) which are in agreement with the corresponding trade records submitted by the opposite clearing members.

Trade records will be matched, to the extent the opposite trade information is consistent, through the tiered matching process.

Resubmitted trade data will be processed by the Clearing House. Trades with unmatched trade information remaining after the tiered matching process will be rejected and outtrade notices will be issued to clearing members.

Trades unreconciled after the final reconciliation must be submitted on the following business day as "as-of-trades."

809.C. Trade Register and Clearing Reports

From the trade data cleared during each day's reconciliation, the Clearing House will produce a trade register for each clearing member which will itemize by commodity and contract: the opening long and short position, the contracts bought and/or sold during the day, the prices at which executed, and the settlement amounts.

The Clearing House will also produce a recap ledger for each clearing member that will itemize various position and financial information that includes but is not limited to, commodity positions, settlement amounts and performance bond information.

809.D. Reconciliation of Outtrades

It shall be the primary responsibility of the clearing member to see that all trades are cleared prior to the opening of the following day's open outcry market.

Each member, if applicable, and clearing member firm shall designate a person or persons who will be available and responsible for reconciling the member or clearing member firm's outtrades. The person or persons shall be qualified to resolve outtrades as the member or clearing member firm's designated outtrade representative. Failure to have a qualified representative available, with all materials necessary to reconcile outtrades, at the time specified above shall constitute negligence in the determination of responsibility for any outtrades. If one firm cannot locate another firm's broker or representative for clearing purposes during these time periods, it shall report such fact to the Global Head of Clearing. If the Global Head of Clearing or their designee cannot find the broker or representative of the firm, fines will be assessed in the amounts of $1,000, $2,000 or $3,000 sequentially, for violations occurring within a 30-day period.

810. FALSE ENTRIES ON CLEARING MEMORANDA

No member shall place any false or inaccurate entries on any clearing memoranda, including, with respect to a Participating Clearing Member, the clearing memoranda of a Cross-Margining Clearing Organization.

811. POSITION CHANGE DATA

Position change data must be submitted to the Clearing House each trading day not later than the time specified by the Clearing House. Position change data will be in such form and contain such information as prescribed by the Clearing House. When requested, the identification of accounts will be made available to the Financial and Regulatory Surveillance Department.

812. FINAL SETTLEMENT PRICE

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Certain products, as described in the applicable product chapters, have procedures for establishing a final settlement price that are distinct from the procedures for establishing the daily settlement price for the product on the last day of trading. For such products, if a final settlement price is unable to be determined or if the applicable procedures result in a clearly aberrant final settlement price inconsistent with market value and alternative settlement procedures are not otherwise specified in the relevant product chapter, then the Chief Executive Officer or Chief Operating Officer, or their delegate, may establish a final settlement price that reflects the true market value at the time of final settlement.

A payment in settlement of a delivery obligation (physical or cash settled) shall not be adjusted after ten business days for any reason, including, without limitation, a calculation error or erroneous and/or incomplete input.

813. DAILY SETTLEMENT PRICE

Daily settlement prices shall be determined each business day for each product pursuant to one or more of the procedures set forth below. The settlement price shall be a price consistent with the minimum tick increment for the product; if the calculated settlement price is not a standard tick increment, the calculated settlement price will be rounded either to the nearest tick or to the tick closer to the previous day's settlement price. The procedure used to determine the settlement price of a product will depend on the product group, level of activity and liquidity during the defined settlement period, and the trading venue(s) used to derive the settlement. To the extent that any members participate in the creation of settlement prices, they agree to assign and transfer to the Exchange any and all right, title and interest in and to the settlement prices, including, but not limited to, all copyright in the settlement prices.

1. [Reserved]

2. Volume-Weighted Average Price (VWAP) of the Settlement Period: In products that use this procedure, all outright trades that occur during the defined settlement period are utilized to calculate the VWAP for specified contract months and the VWAP will be the settlement price. If the open outcry venue is used to determine the settlement price, the VWAP may be estimated. The calculated or estimated VWAP of relevant spread trades that occur during the settlement period may be used to determine the settlement price of deferred or less actively traded contract months in products that use this procedure.

3. Bid/Ask Midpoint at the Settlement or during the Settlement Period: In products that use this procedure, the midpoint of the bid/ask at the defined settlement time or during the defined settlement period will be the settlement price.

4. Option Settlements: Option settlements are derived from available market information including, but not limited to, outright trades, bids or offers during the settlement period, relevant spread trades, bids or offers during the settlement period, the settlement price of the underlying future and relevant relationships based on option pricing theory using option pricing models employed by the Exchange.

5. For all contract months not determined by one of the methods set forth above or pursuant to Section 6 below, relevant spread relationships between contract months will be used to derive the settlement.

6. In the event the Exchange determines that the settlement price derived by one of the methods set forth above is not an accurate representation of the relevant market, the Exchange may determine the settlement price based on other market prices, including settlement prices for similar contracts trading on other exchanges.

7. For all products that are settled with the delivery of, or by reference to, the same underlying instrument but which are offered in alternative contract sizes (mini or micro), a single settlement price will be applicable to all such contracts, with necessary adjustments made to round to the nearest tradable price increment eligible in all such contracts.

8. For contracts cleared through ClearPort Clearing that are not otherwise settled by one of the methods set forth above, staff shall determine settlement prices for such contracts based upon a consideration of relevant market data, including, but not limited to, trading activity in relevant OTC products, pricing data obtained from OTC market participants, the settlement prices of related products and any other pricing data from sources deemed reliable by Staff.

9. Notwithstanding the above, if a settlement price in any product, as derived by the normal methodology used for that product, is inconsistent with trades, bids or offers in other

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months/strikes during the settlement period, or other relevant market information, or if there is no relevant market activity, an Exchange official may establish a settlement price that best reflects the true market valuation at the settlement time or during the defined settlement period.

10. For products cleared by the Clearing House on behalf of another entity, the settlement price shall be determined according to the rules of such entity.

11. Notwithstanding the above, in the case of inaccuracy or unavailability of a settlement price, or if a settlement price creates risk management concerns for the Clearing House, the Clearing House reserves the right to calculate settlement variation using an alternate price determined by the Clearing House.

814. SETTLEMENTS, SETTLEMENT VARIATION PAYMENTS, AND OPTION VALUE

When a clearing member or its customer is long or short any amount of any Commodity for a settlement cycle, as indicated by Clearing House records, settlement for any outstanding exposure shall be made with the Clearing House. A settlement cycle shall be conducted at least once each Business Day at such times as the Clearing House shall determine. The Clearing House may establish different settlement cycles for different contracts. For purposes of this Rule 814, "outstanding exposure" shall mean the obligations to pay, as applicable, any settlement variation payment and any other payments due in respect of a Commodity (including price alignment amount, coupon payments, option premiums and upfront fees and, for the avoidance of doubt, excluding any posting of performance bond).

Each clearing member for its proprietary and customer positions shall pay to, or collect from, the Clearing House any loss or profit for non-option Commodities as a settlement variation payment, as the case may be, represented by the difference between (x) the settlement price of the Commodity for such settlement cycle and (y) the settlement price of the Commodity for the prior settlement cycle (or, for the first settlement cycle after the purchase/sale of such Commodity, the price at which the Commodity was purchased or sold).

Except as otherwise specifically provided for in the contract chapters, for Commodities that are options, the Clearing House will determine option value for each option and the net option value of each portfolio. For a settlement cycle, (i) if the net option value of the portfolio is positive, such amount may be used to satisfy performance bond requirements for the portfolio, (ii) if the net option value of a portfolio is negative, such amount will increase the performance bond requirements for the portfolio.

All payments in satisfaction of outstanding exposures must be paid in cash or any other form of payment approved by the Clearing House Risk Committee; shall be settlement (within the meaning of CFTC Rule 39.14); and shall be final, irrevocable and unconditional no later than when the correct Clearing House bank account at the relevant settlement bank is debited or credited with the payment. Payments in satisfaction of outstanding exposures shall not constitute "property, cash, securities or collateral deposited with the Clearing House" for purposes of Rules 819 and 8F008 but, where such payments are retained by the Clearing House at the instruction of the Clearing Member, such payments shall be deemed to be property held by the Clearing House within the meaning of Section 761(10) of the US Bankruptcy Code.

For each of the Clearing House's classes of clearing (i.e., Base Guaranty Fund Products and IRS Products), once all payments in satisfaction of outstanding exposure between a clearing member and the Clearing House for a settlement cycle are final for any of the clearing member's house account, its customer segregated account, its customer secured account or its cleared swaps customer account, the outstanding exposure between the clearing member and the Clearing House for all Commodities in such class of clearing in the respective account subject to that settlement cycle shall be settled, and the fair value of each such Commodity shall then be reset to zero.

Notwithstanding the foregoing, the Clearing House shall not be required to pay any profit to a Participating Clearing Member in the event that such member or its Cross-Margining Affiliate fails to make any required settlement for that settlement cycle with a Cross-Margining Clearing Organization.

If the market conditions or price fluctuations are such that the Clearing House deems it necessary, it may call upon the clearing members, which in its opinion are affected, to pay funds to the Clearing House by such time and in such amount as specified by the Clearing

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House to meet such settlements as the Clearing House estimates may be necessary. The Clearing House may pay out funds to those clearing members that, in the opinion of the Clearing House, will have credit balances as a result of those same market conditions or price fluctuations; except that in no instance may the Clearing House pay out funds to a clearing member, other than at the regular settlement, in excess of the total original performance bond deposits it holds for such clearing member. All payments made under this Rule shall be subject to the procedures prescribed by the Clearing House and set forth in the Manual.

815. THIRD PARTY EXECUTION PLATFORMS FOR SWAPS

815.A. Exclusivity of Clearing House Rules

The Clearing House Rules shall exclusively apply, and prevail to the extent there is any conflict with any third party rules, to all swap trades, and resulting positions, from the time that a swap trade, including a swap trade executed on a Swap Execution Facility ("SEF") or other third party execution platform for swaps (collectively, "Third Party Execution Platforms"), is submitted for clearing. Notwithstanding the foregoing, if the Clearing House rejects a swap trade for clearing, the Clearing House Rules shall cease to apply to that swap trade until such swap trade is resubmitted for clearing.

815.B. Clearing House Authority

The Clearing House will have the sole authority to:

1. determine whether any trade submitted for clearing will be accepted or rejected. For the avoidance of doubt, Third Party Execution Platforms may not make a determination on clearing acceptance or rejection and may only communicate the Clearing House's determination of whether a trade has been accepted or rejected for clearing.

2. block or cancel any trades submitted for clearing by, or on behalf of, any Third Party Execution Platforms if it determines that such trades were executed or submitted to the Clearing House in error.

3. deny or terminate the connection of Third Party Execution Platforms to the Clearing House due to technical, operational or risk management issues at the Third Party Execution Platforms.

4. determine whether it will accept any trade transaction counterparty risk.

5. determine whether contracts cleared by the Clearing House are economically equivalent and should be offset within the Clearing House pursuant to the Act.

815.C. Voids and Price Adjustments

A void or price adjustment for any swap trade that has been accepted for clearing is not valid without the consent of the Clearing House.

815.D. Submission to Clearing House Rules and Access to Execution Platforms

All Third Party Execution Platforms that submit, or have submitted on their behalf, swap trades for clearing to the Clearing House shall be bound by Clearing House Rules, including, but not necessarily limited to, the disciplinary Rules and the emergency Rules contained in Chapters 2, 4, 8, and 8G and shall, at all times, provide the Clearing House with access to its execution platform for risk management purposes.

815.E. Compliance with Regulatory Standards

No Third Party Execution Platform may submit swap trades for clearing to the Clearing House unless it has complied with all applicable CFTC regulations, standards and requirements including, but not limited to, technological, operational and risk management standards.

815.F. Transfer of Swap Positions

No swap positions may be transferred, including those resulting from an execution on Third Party Execution Platforms, unless such transfer is made in accordance with the Clearing House Rules.

815.G. Applicability to Security-Based Swaps

Rule 815 does not apply to security-based swaps.

816. GUARANTY FUND DEPOSIT

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Each clearing member shall make a Base Guaranty Fund deposit with the Exchange as security for its obligations to the Clearing House. The minimum Base Guaranty Fund deposit of a clearing member shall equal the greater of (a) $500,000 if clearing CME, CBOT, NYMEX or COMEX futures and options on futures only, (b) $2,500,000 if clearing OTC spot, forward or swaps contracts or (c) the clearing member's proportionate share of the "Aggregate Guaranty Fund Deposit." This requirement is separate and distinct from the guaranty fund deposit requirement for IRS Products as set forth in Chapter 8G of the CME Rulebook. The Aggregate Guaranty Fund Deposit shall be an amount determined by the Clearing House.

Each clearing member's proportionate share of the Aggregate Guaranty Fund Deposit shall consist of:

(i) a specified percentage of the Aggregate Guaranty Fund Deposit multiplied by the clearing member's proportionate share (including the total risk performance bond requirement in respect of positions in its cross-margin accounts and any applicable short option value) of the average aggregate risk performance bond requirement (including the risk performance bond requirement in respect of positions in all cross-margin accounts and any applicable short option value) for the preceding three months; plus

(ii) a specified percentage of the Aggregate Guaranty Fund Deposit multiplied by the clearing member's proportionate share of the total number of contracts executed on the Exchange and any applicable exchange or market during the preceding three months; plus

(iii) a specified percentage of the Aggregate Guaranty Fund Deposit multiplied by the clearing member's proportionate share of foreign currency settlements for the preceding three months.

The percentages in (i) through (iii) above shall be determined and modified by the Clearing House Risk Committee as appropriate. Some contracts may be weighted more heavily than others in order to reflect the greater risk associated with those contracts. The average aggregate risk performance bond requirement, the total number of contracts executed, the gross notional amount of open interest cleared and each clearing member's proportionate share of each will be calculated by the Clearing House, and a report setting forth such information and the clearing member's required Base Guaranty Fund deposit will be given to the clearing member each month, and the Clearing House may provide such reports on an interim basis at any time during the month as the Clearing House staff shall determine. If at any time, such report indicates that the clearing member's current Base Guaranty Fund deposit with the Clearing House is smaller than the amount required, the clearing member shall increase its amount within two business days. If such report indicates that the clearing member's current Base Guaranty Fund deposit with the Exchange is larger than the amount required, the clearing member may withdraw the excess amount. If, prior to the issuance of the monthly report, the Clearing House determines that an increase in the Base Guaranty Fund deposit is necessary to protect the financial integrity of the Clearing House, the clearing member, upon demand of the Clearing House, shall increase its Base Guaranty Fund deposit amount within two business days. In the event that an interim report is issued within five business days prior to the regularly scheduled monthly report, the Clearing House may opt to forego the issuance of an additional month-end report, provided that the amount of resources required has not changed substantially during this period.

A clearing member's Base Guaranty Fund deposit may be in a form as set forth in the Manual. Such Base Guaranty Fund deposit forms and amounts shall be subject to the terms and conditions as approved by Exchange staff.

817. LIQUIDITY FACILITY

The Exchange may enter into liquidity facilities (each a “Liquidity Facility”) to convert collateral to cash in any case where the Clearing House can use the collateral, pursuant to Chapters 8, 8F, 8G, and 9 of the Rules of the Exchange, and use the cash proceeds to meet an obligation to the Clearing House.

If a clearing member of CME, CBOT, NYMEX, COMEX or OTC Clearing Member (a) is unable to promptly discharge any obligation to the Clearing House or (b) is suspended or becomes subject to any bankruptcy, reorganization, arrangement, insolvency, moratorium, liquidation or other similar proceedings under U.S. federal or state bankruptcy laws or other applicable law, collateral deposited by the clearing member in satisfaction of its performance bond and guaranty fund requirements may be used to obtain liquidity to satisfy the clearing member's obligations to the Clearing House as follows: (1) performance bond collateral relating to a

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clearing member's proprietary account may be used to obtain liquidity to meet obligations relating to the clearing member's proprietary account, customer segregated account, secured account or cleared swaps customer account; (2) performance bond collateral relating to a clearing member's customer segregated account may only be used to obtain liquidity with respect to obligations of such account; (3) performance bond collateral relating to a clearing members secured account may only be used to obtain liquidity with respect to obligations of such account; (4) performance bond deposits relating to a clearing member's cleared swaps customer account may only be used to obtain liquidity with respect to such account; and (5) guaranty fund collateral may be used in the order prescribed by Rules 802.B, and 8G802.B.

In any case where the Rules of the Exchange permit the Clearing House to use guaranty fund collateral deposited by clearing members who have not failed to meet an obligation to the Clearing House, the Clearing House may convert collateral held in that Guaranty Fund to cash by means of a Liquidity Facility.

By delivering assets to the Exchange in satisfaction of guaranty fund deposit and performance bond requirements, each clearing member is hereby deemed: (i) to agree that its assets (or its customers' assets, as provided above) may be transferred by the Exchange to obtain liquidity from the Exchange's liquidity lenders and that its assets may become subject to a lien in favor of the Exchange's liquidity lenders or otherwise guarantee the Exchange's obligations and; (ii) to authorize the Exchange, and appoint the Exchange (such appointment being coupled) with an interest as such clearing member's attorney-in-fact, to enter into agreements on its behalf in connection with its assets (or its customers' assets, as provided above) being transferred to the Exchange's liquidity lenders: and (iii) to acknowledge that the obligations of the Exchange to the Exchange's liquidity lenders may be greater, and extend for periods of time longer, than the obligations, if any, of such clearing member to the Exchange.

The Exchange, as each clearing member's attorney-in-fact, will have authority to enter into agreements on behalf of each clearing member and in each clearing member's name for the purpose of causing the clearing member's assets (or its customers' assets, as provided above) to be transferred to the Exchange's liquidity lenders. Any agreement entered into by the Exchange on behalf of clearing members pursuant to this Rule 817 shall bind each clearing member and will contain provisions, including representations, warranties and covenants, required by lenders under any liquidity facility.

If there is a default under any such liquidity facility, the assets of clearing members transferred to the Exchange's liquidity lenders may be foreclosed upon by such lenders and applied against the obligations of the Exchange under the related liquidity facility. Clearing members shall take no action, including but not limited to attempting to obtain a court order, that would interfere with the ability of such liquidity lenders to receive the benefit of their contractual remedies in connection with any such foreclosure or that would controvert or assert the invalidity of any provision of these rules. Each clearing member agrees to sign any document or agreement requested by the Exchange to further document the power of attorney set forth and established by these rules.

The foregoing provisions shall apply without regard to whether a clearing member has been declared to be in default under the Rules.

818. CLOSE-OUT NETTING

818.A. Bankruptcy of the Exchange

If at any time the Exchange: (i) institutes or has instituted against it a proceeding seeking a judgment of insolvency or bankruptcy or any other relief under any bankruptcy or insolvency law or other similar law affecting creditors' rights, or a petition is presented for its winding up or liquidation, and, in the case of any such proceeding or petition presented against it, such proceeding or petition results in a judgment of insolvency or bankruptcy or the entry of an order for relief or the making of an order for the Exchange's winding-up or liquidation, or (ii) approves resolutions authorizing any proceeding or petition described in clause (i) above (collectively, a "Bankruptcy Event"), all open positions in the Clearing House shall be closed promptly.

818.B. Default of the Exchange

If at any time the Exchange fails to comply with an undisputed obligation to pay money or deliver property to a Clearing Member that is due and owing in connection with a transaction on the Exchange or cleared by the Exchange, for a period of five Business Days from the date

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that the Exchange receives notice from the Clearing Member of the past due obligation, the Clearing Member's open proprietary and customer (including, for this rule, CFTC Regulation Section 30.7 customers and cleared swaps customers) positions at the Clearing House shall, at the election of that Clearing Member, be closed promptly. For the avoidance of doubt, any modification to any Base Contract under Rule 802.B.7. or any IRS Contract under 8G802.B.3. shall not be considered a failure by the Exchange to comply with an obligation to pay money or deliver property.

818.C. Netting and Offset

1. At such time as a Clearing Member's positions are closed:

(i) the obligations of the Clearing House to such Clearing Member in respect of the Clearing Member's proprietary positions, accounts, collateral and guaranty fund deposits shall be netted against the obligations of such Clearing Member to the Clearing House and to the Exchange in respect of its proprietary positions, accounts, collateral, guarantees of the performance of its customers and any obligations to guarantee funds without respect to product category ("Proprietary Netting");

(ii) the obligations of the Clearing House to the Clearing Member in respect of such Clearing Member's customers' futures positions, including foreign futures positions carried in the futures account class, futures accounts, and futures collateral shall be netted against the obligations of the Clearing Member to the Clearing House in respect of the futures positions, futures accounts and futures collateral of such customers ("Futures Customer Netting"); and

(iii) the obligations of the Clearing House to the Clearing Member in respect of such Clearing Member's individual customers' swap positions, swap accounts, and swap collateral shall be netted against the obligations of the Clearing Member to the Clearing House in respect of the swap positions, swap accounts and swap collateral of each individual customer, on an individual customer by customer basis ("Swap Customer Netting"); and

(iv) the obligations of the Clearing House to the Clearing Member in respect of such Clearing Member's customers' foreign futures positions carried in the foreign futures account class, foreign futures accounts, and foreign futures collateral shall be netted against the obligations of the Clearing Member to the Clearing House in respect of the futures positions, futures accounts and futures collateral of such customers ("30.7 Futures Customer Netting").

Notwithstanding the foregoing, the amount of any proprietary or customer claim extinguished as a result of the application of the terminating and netting procedures set forth in either Rule 802.B. (with respect to Base Products) or Rule 8G802.B (with respect to IRS Products), shall not be available for netting in Proprietary Netting, Futures Customer Netting, Swap Customer Netting or 30.7 Futures Customer Netting, as applicable. Proprietary Netting, Futures Customer Netting, Swap Customer Netting and 30.7 Futures Customer Netting shall be performed in accordance with the Bankruptcy Code, the Commodity Exchange Act and the regulations promulgated thereunder. Rule 818 shall be deemed to be (i) a master netting agreement for Proprietary Netting; (ii) a master netting agreement for Futures Customer Netting, (iii) a master netting agreement for Swap Customer Netting, and (iv) a master netting agreement for 30.7 Futures Customer Netting.

2. After a Bankruptcy Event takes place, the authority of the Clearing House, pursuant to Rule 802, to make new assessments and/or require a Clearing Member to cure a deficiency in its guaranty fund deposit arising after the Bankruptcy Event, shall terminate.

3. All positions open immediately before being closed in accordance with this Rule shall be valued in accordance with the procedures of Paragraph D of this Rule.

818.D. Valuation

As promptly as reasonably practicable, but in any event within thirty days of the: (i) Bankruptcy Event, or (ii) if a Clearing Member elects to have its open positions closed in a default as described in Paragraph B of this Rule, the date of the election, the Exchange shall, in a manner that is consistent with the requirements of the Commodity Exchange Act and the regulations adopted thereunder (including, without limitation) Part 190 of the Regulations, fix a U.S. dollar amount (the "Close-out Value") to be paid to or received from the Exchange by each Clearing Member, after taking into account all applicable netting and offsetting pursuant to paragraph C of this Rule.

The Exchange shall value open positions subject to close-out by using the market prices for the relevant market (including without limitation, any over the counter markets) at the moment

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that the positions were closed-out, assuming the relevant markets were operating normally at such moment. If the relevant markets were not operating normally at such moment, the Exchange shall exercise its discretion, acting in good faith and in a commercially reasonable manner, in adopting methods of valuation to produce reasonably accurate substitutes for the values that would have been obtained from the relevant market if it had been operating normally at the moment that the positions were closed-out.

If a default of a Base Clearing Member or IRS Clearing Member has also occurred, if a settlement cycle was conducted pursuant to Rules 802.B. and 8G802.B. as applicable, and the Clearing House has not fully liquidated (or ported) all of the clearing member's proprietary and customer positions, the Exchange shall value open positions subject to close-out by using the prices that were determined pursuant to the final settlement cycle that was conducted pursuant to Rules 802.B. and 8G802.B., as appropriate.

In determining a Close-out Value, the Exchange may consider any information that it deems relevant. Amounts stated in a currency other than U.S. Dollars shall be converted to U.S. Dollars at the current rate of exchange, as determined by the Exchange. If a Clearing Member has a negative Close-out Value it shall promptly pay that amount to the Exchange.

818.E. Interpretation in Relation to FDICIA

The Exchange intends that certain provisions of this Section be interpreted in relation to certain terms (identified by quotation marks) that are defined in the Federal Deposit Insurance Exchange Improvement Act of 1991 ("FDICIA"), as amended, as follows:

1. The Exchange is a "clearing organization."

2. An obligation of a Clearing Member to make a payment to the Exchange, or of the Exchange to make a payment to a Clearing Member, subject to a netting agreement, is a "covered clearing obligation" and a "covered contractual payment obligation."

3. An entitlement of a Clearing Member to receive a payment from the Exchange, or of the Exchange to receive a payment from a Clearing Member, subject to a netting contract, is a "covered contractual payment entitlement."

4. The Exchange is a "member," and each Clearing Member is a "member."

5. The amount by which the covered contractual payment entitlements of a Clearing Member or the Exchange exceed the covered contractual payment obligations of such Clearing Member or the Exchange after netting under a netting contract is its "net entitlement."

6. The amount by which the covered contractual payment obligations of a Clearing Member or the Exchange exceed the covered contractual payment entitlements of such Clearing Member or the Exchange after netting under a netting contract is its "net obligation."

The By-Laws and Rules of the Exchange, including this Section, are a "netting contract."

819. LIEN ON COLLATERAL

Each Clearing Member hereby grants to the Clearing House to secure obligations of such Clearing Member to the Clearing House a first priority and unencumbered security interest and lien against any property, cash, securities or collateral deposited with, transferred or pledged to, or otherwise where control is given to the Clearing House by such Clearing Member. Clearing Members shall take any action that may be required by the Clearing House to create, preserve, perfect, validate or enforce any such security interest.

820. PERFORMANCE BONDS

Performance bond requirements will be as determined by Clearing House staff from time to time. Clearing Members must post performance bond to the Clearing House on a gross basis for each of its omnibus customer accounts.

Subject to the terms and conditions as approved by Clearing House staff, the Clearing House will accept as performance bond, cash, equity securities, shares of mutual funds, United States Treasury and agency Securities, Letters of Credit, shares in CME's Interest Earning Facility 2 Program, permitted investments allowable under CFTC Regulation 1.25, "readily marketable securities" as defined by Securities and Exchange Commission Rules, as applicable, gold warrants that are registered as deliverable for gold futures contracts traded on Commodity Exchange, Inc., and "London Good Delivery" gold, as defined by the London Bullion Market Association (as used in this Rule 820, such assets and any proceeds thereof are collectively referred to as "Assets"), all of which must be and remain unencumbered. The Clearing House

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may include other forms of collateral within the definition of “Assets” upon the approval of the Clearing House Risk Committee and notice to clearing members.

All performance bond collateral, as herein described, shall be placed to the credit of the member paying the same for its customers' trades or its own (so-called "house") trades as designated by the clearing member. The Clearing House shall value performance bond collateral as it deems appropriate. The clearing member shall transfer the performance bond collateral to the Clearing House or to an approved depository for safekeeping in a Clearing House account and the Clearing House shall retain control over such performance bond collateral. Neither the Exchange nor the Clearing House shall have any obligation or responsibility to preserve, protect, collect or realize upon, and under no circumstances shall the Exchange or Clearing House be liable for, any loss or diminution in value or depreciation in the performance bond collateral maintained pursuant to this rule. A clearing member who maintains performance bond collateral for its benefit pursuant to this rule shall hold the Exchange and Clearing House harmless from all liability, losses and damages which may result from or arise with respect to the care and sale of such performance bond collateral. All initial and additional performance bonds shall be retained by the Clearing House in whole or in part, as Clearing House staff may deem necessary, until the trades for which such performance bond collateral has been deposited, have been offset, cash settled, delivered or otherwise closed out as determined by Clearing House staff.

Each clearing member shall reimburse the Clearing House for all fees, expenses, charges and costs assessed by a depository against the Clearing House with respect to all performance bond collateral maintained in its account, and shall make deposits as may be required by the Clearing House by reason of any depreciation in the market value of such performance bond collateral. If a clearing member defaults to the Clearing House with respect to performance bonds, the performance bond collateral maintained in its account pursuant to this rule shall be taken over by the Clearing House and sold without notice and the proceeds of the performance bond collateral deposited for customers' trades shall be applied against the performance bond requirements for the clearing members' customers' accounts, and the proceeds of performance bond collateral deposited for the house trades shall be applied against the requirements for the clearing member's own (so-called "house") account.

821. EXCESS PERFORMANCE BOND OF CLEARED SWAPS CUSTOMERS

Pursuant to CFTC Regulation 22.13(c), the Clearing House will permit a Clearing Member to transmit performance bond of its cleared swaps customers in excess of the amount required by the Clearing House for such cleared swaps customers positions. Each Clearing Member transmitting such excess shall identify each Business Day, for each cleared swaps customer, the value of performance bond posted in excess of the amount required for such cleared swaps customer.

822. LIQUIDITY RISK MANAGEMENT

In order to satisfy CFTC Regulations and prudential liquidity standards, the Clearing House is establishing the following rules:

822.A. Liquidity Rules

In the event the Clearing House needs liquidity for non-cash collateral of a clearing member or its customers for same day settlement, the Clearing House will first attempt to obtain liquidity for such collateral through asset sale, any uncommitted funding arrangements, its committed lines of credit and any committed repurchase agreements. In the event the Clearing House is unable to obtain same day settlement through such means, the Clearing House may declare the occurrence of a Liquidity Event and in its sole discretion may take the following actions in the following order to secure same day liquidity for such assets as follows:

1. Substitution of Guaranty Fund Cash

a. The Clearing House may substitute any cash deposited by clearing members in a guaranty fund with U.S. Treasuries deposited as performance bond or guaranty fund by a clearing member that is the subject of such Liquidity Event. The amount of cash substituted hereunder shall be equal to the haircutted market value (determined by the Clearing House as of the prior day’s close of business utilizing a recognized third party pricing source) of the U.S. Treasuries that are substituted for such cash. Any assets transferred by this rule shall be applied as guaranty fund deposit(s) of any such clearing member whose cash was

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substituted and will be allocated pro rata among any clearing members with cash deposits. The substitution of U.S. Treasuries for the clearing member's guaranty fund deposit(s) will be limited to the size of the clearing member's guaranty fund deposit(s) at the time of the Liquidity Event. For any substitution of U.S. Treasuries for cash in a guaranty fund, the impacted clearing member may, within 24 hours of substitution, request that the Clearing House replace the cash for the substituted U.S. Treasuries, to the extent still on deposit, within 29 days of the date of substitution. Any clearing member requesting cash replacement will receive the exact value in cash received by the Clearing House upon liquidation the U.S. Treasuries.

b. The Clearing House may direct any clearing member that is a U.S. Government Securities Broker-Dealer or has a U.S. Government Securities Broker-Dealer affiliate to substitute its non-cash guaranty fund assets with cash within 60 minutes from the time of notification. Such directions will be made during the hours in which the Federal Reserve's securities wire transfer system is in operation, provided, however that is such directions are given within 60 minutes prior to the close of the Federal Reserve's securities wire, the substitution required hereunder shall be made within 60 minutes after the Federal Reserve's securities wire next opens. To the extent that a clearing member(s) fails to provide cash within the deadlines specified above, the Clearing House may debit cash from that clearing member's settlement bank account in the amount of the clearing member's non-cash guaranty fund assets.

2. U.S. Treasury Sale to Meet Clearing House Settlement Variation Obligations

The Clearing House may offset its US dollar settlement variation obligations to any clearing member that is a U.S. Government Securities Broker-Dealer or has a U.S. Government Securities Broker-Dealer affiliate, up to the amount of that clearing member's guaranty fund contribution(s), by selling U.S. Treasuries valued based on the prior day's closing prices with prevailing CME haircuts applied in exchange for US dollar cash from the clearing member. The US dollar cash received by CME from the clearing member shall be in the form of the variation margin obligation owed by CME and CME shall deliver the purchased U.S. Treasury securities to the U.S. Government Securities Broker-Dealer.

822.B. Transfer or Disbursement of Collateral as Compensation for Portfolio Auction, Sale or Transfer with Notice in Advance

To the extent permitted by the terms of any auction, sale or transfer of a defaulted or suspended clearing member's or customer portfolio for which a payment is owed by the Clearing House to an auction winner, purchaser or transferee, in lieu of satisfying such payment with cash, the Clearing House may satisfy any payment owed to such persons by transferring Federal Reserve discount window eligible securities with a market value (determined by the Clearing House as of the prior day's close of business utilizing a recognized third party pricing source) equal to the amount of such obligation.

823. [RESERVED]

824. ADDITIONAL PERFORMANCE BOND

Whenever, in the opinion of the Clearing House Risk Committee or the Global Head of Clearing or, in their absence, their delegate, unstable conditions relating to one or more products exist, they may from time to time, call for additional performance bond collateral from clearing members. Such additional performance bond calls may be as much as or more than the original performance bond collateral. The performance bond collateral thus called for may be for one or more contract(s) from one or more clearing member(s) and on long positions, short positions or both.

In the event market conditions and price fluctuations at any time shall cause the Clearing House Risk Committee or the Global Head of Clearing or, in their absence, their delegate, to conclude that additional performance bond collateral is required to maintain an orderly market in contracts traded on the exchange or to preserve fiscal integrity the Clearing House Risk Committee or the Global Head of Clearing or their delegate may call for additional performance bond collateral to be deposited with the Clearing House during the next banking hour after demand therefor, or at such times as may be specified. Such additional performance bond collateral may be called from the longs or the shorts or from both.

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When the Clearing House Risk Committee or the Global Head of Clearing or, in their absence, their delegate, shall be of the opinion that any clearing member is carrying commitments or incurring risk in its proprietary, customer and/or cross-margin accounts, that are larger than is justified by the financial condition of that clearing member, then the Clearing House Risk Committee or the Global Head of Clearing or, in their absence, their delegate, may require additional performance bond collateral of such clearing member which shall be deposited with the Clearing House during the next banking hour after demand therefor, or at such time as may be specified, or a portion of the open positions of said clearing member may be required to be transferred to the books of another clearing member.

825. SEGREGATION OF PERFORMANCE BOND

The performance bond assets resulting from any rehypothecation, investment, pledge or disposition of the original performance bond assets deposited by a clearing member that is not a defaulting or suspended clearing member, to the extent the Exchange is not required to transfer or pay out to third parties such resulting performance bond assets to meet the Exchange's obligations with respect to the clearing member pursuant to the Rules, shall be held by the Exchange in the same manner in which the Exchange holds performance bond assets of the same form as the resulting performance bond assets.

826. PROPRIETARY ACCOUNT MINIMUM LIQUIDATION PERIOD

(a) With respect to clearing member proprietary positions, the Clearing House shall ensure performance bond requirements are calculated and collected using a liquidation period of not less than two (2) days calculated on a net basis.

(b) Paragraph (a) of this Rule does not apply to positions in (i) agricultural commodity derivatives contracts that meet the exclusion criteria established in Article 2 of the European Commission's equivalence determination dated February 24, 2016; or (ii) cleared-only OTC products accepted for clearing by the Clearing House.

827. SECURITIES LENDING PROGRAM

United States Treasury Bills, Treasury Notes, Treasury Bonds, Treasury Bond Principal Strips, Agency Securities, and other financial instruments approved by Exchange staff, (collectively, "Securities") that are deposited with the Clearing House by clearing members in satisfaction of Guaranty Fund requirements or as performance bond for their own (i.e., "house") trades may be loaned out by the Exchange pursuant to the Securities Lending Program. Clearing members depositing Securities with the Exchange in satisfaction of guaranty fund requirements or as performance bond for house trades that are loaned out pursuant to the Securities Lending Program are deemed to agree that the lending of Securities under arrangements having safeguards consistent with generally accepted market practices will constitute reasonable care of the Securities in the possession of the Exchange or its securities lending custodian.

828. BASE FINANCIAL RESOURCES

The Clearing House shall maintain funded financial resources sufficient to enable the Clearing House to meet its financial obligations to CME, CBOT, NYMEX and COMEX clearing members notwithstanding a default by the two clearing members creating the largest combined loss to the Clearing House in extreme but plausible market conditions. If a clearing member controls another clearing member or is under common control with another clearing member, the affiliated clearing members shall be deemed to be a single clearing member for financial resources calculations under this rule.

829. MEASURES TO MITIGATE PROCYCLICALITY

(a) With respect to exchange traded derivatives contracts it clears, the Clearing House shall establish performance bond requirements designed to limit the likelihood of procyclical changes in performance bond requirements and mitigate costly and disruptive adjustments to performance bond requirements in periods of high market volatility. The Clearing House shall maintain specific risk management procedures ensuring that performance bond is calculated and collected on a basis that includes measures designed to limit procyclicality that are equivalent to at least one of the options listed in Article 28 (Procyclicality) of Delegated Regulation (EU) No. 153/2013. Such anti-procyclicality measures shall include tools such as

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extended lookback periods, seasonal volatility metrics, volatility floors, stress volatility metrics and implied volatility.

The Clearing House shall regularly review the measures it utilizes to address procyclicality to ensure they are appropriate in light of market conditions.

Further, the Clearing House's anti-procyclicality measures shall be designed to ensure that its policy for setting performance bond requirements delivers forward looking, stable, conservative, and prudent performance bond requirements that limit procyclicality to the extent that the soundness and financial security of the CCP is not negatively affected.

(b) Paragraph (a) does not apply to positions in agricultural commodity derivatives contracts that meet the exclusion criteria established in the Article 2 of the European Commission's equivalence determination dated February 24, 2016.

830. CROSS-MARGINING

830.A. Definitions

1. Cross-Margining Affiliate: An affiliate of a Participating Clearing Member with which such clearing member is cross-margining its positions at the Clearing House and a Cross-Margining Clearing Organization.

2. Participating Clearing Member: A clearing member that is cross-margining its positions at the Clearing House with its own or a Cross-Margining Affiliate's positions at a Cross- Margining Clearing Organization.

3. Cross-Margining Clearing Organization: A clearing organization that has entered into a Cross-Margining Agreement with the Exchange.

4. Joint Cross-Margining Program: A cross-margining program in which the Exchange and one or more Cross-Margining Clearing Organizations each hold a joint security interest in positions, margin and other property of Participating Clearing Members and, if applicable, their Cross-Margining Affiliates.

5. Guaranteed Cross-Margining Program: A cross-margining program in which a guaranty is provided by and between the Exchange and one or more Cross-Margining Clearing Organizations and each entity holds an individual security interest in positions, margin and other property of Participating Clearing Members and, if applicable, their Cross-Margining Affiliate.

830.B. Cross–Margining Programs

1. The Exchange may establish cross-margining programs as approved by the Clearing House Risk Committee and the Board. A clearing member may become a Participating Clearing Member to participate in a Joint Cross-Margining Program by establishing with the Clearing House one or more cross-margin accounts for cross-margining positions with either its own positions or those of a cross-margining affiliate at a Cross-Margining Clearing Organization. In order to establish a cross-margin account, a clearing member shall enter into the agreements required by the Exchange, including a Cross-Margined Account Agreement and Security Agreement with the Exchange, the Cross-Margining Clearing Organization, and, if applicable, the member's Cross-Margining Affiliate. That Agreement shall provide, among other things, that the Exchange and the Cross-Margining Clearing Organization shall jointly have a first lien on and security interest in all positions held in the cross-margin account, all related performance bond, and all proceeds of the foregoing, as security for the obligations of the clearing member and, if applicable, its Cross-Margining Affiliate, to the Exchange and the Cross-Margining Clearing Organization. Failure to comply with the terms of such Agreements may constitute an act detrimental to the interest or welfare of the Exchange.

2. A clearing member may become a Participating Clearing Member in a Guaranteed Cross-Margining Program by entering into a Cross-Margining Participant Agreement with the Exchange, the Cross-Margining Clearing Organization, and, if applicable, the clearing member's Cross-Margining Affiliate. That Agreement shall provide, among other things, that a Participating Clearing Member shall immediately be obligated to reimburse the Exchange ("Reimbursement Obligation") in the event the Participating Clearing Member or its Cross-Margining Affiliate defaults in the payment of any obligation to a Cross-Margining Clearing Organization and the Exchange is required to make a guaranty payment to such Cross-Margining Clearing Organization. In addition, the Agreement shall provide that the Exchange shall have a first lien and security interest in all positions held, all related performance bond,

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and all proceeds of the foregoing, as security for the obligations of the clearing member and, if applicable, its Cross-Margining Affiliate, to the Exchange. Failure to comply with the terms of such Agreement may constitute an act detrimental to the interest or welfare of the Exchange.

The provisions of this Rule 830 and the corresponding sections of the Clearing House Manual shall apply to all CME–cleared positions held pursuant to a cross–margining program and shall supersede all other provisions of the Rules to the extent inconsistent therewith. In addition, the Exchange shall determine what positions will be eligible for cross-margining.

830.C. [Reserved]

830.D. Performance Bonds for Cross–Margining Program

Performance bond requirements for a Joint and Guaranteed Cross–Margining Program shall be determined as set forth in the Cross-Margining Agreement, and that Agreement shall also govern what forms of performance bond will be permitted and how such performance bond will be held.

830.E. Close–Out of Cross–Margin Positions

A Participating Clearing Member may be suspended if it or its Cross-Margining Affiliate, if any, is in default in payment of any obligation, including a Reimbursement Obligation, with respect to a Joint or Guaranteed Cross–Margining Program.

The cross-margin account of a clearing member participating in a Joint Cross–Margining Program may be liquidated by the Clearing House at the request of a Cross-Margining Clearing Organization whether or not the Exchange suspends, or is permitted under the Rules to suspend, such clearing member. Upon the suspension of a Participating Clearing Member, or upon receiving notice from a Cross-Margining Clearing Organization of its suspension of a Participating Clearing Member or its Cross-Margining Affiliate, the Clearing House shall have the right to liquidate the positions in the cross-margin account, convert to cash the performance bond therefor, and dispose of the proceeds thereof, all in accordance with the terms of the Cross-Margining Agreement.

The positions of a clearing member participating in a Guaranteed Cross-Margining Program may be liquidated by the Clearing House in the event that the Participating Clearing Member or its Cross-Margining Affiliate defaults in the payment of any obligation to the Clearing House or a Cross-Margining Clearing Organization. Upon the suspension of a Participating Clearing Member, or upon receiving notice from a Cross-Margining Clearing Organization of its suspension of a Participating Clearing Member or its Cross-Margining Affiliate, the Clearing House may liquidate: the positions of the Participating Clearing Member; all related performance bond; and all proceeds of the foregoing. The Exchange may then apply all such liquidated proceeds to satisfy the Participating Clearing Member's obligations to the Exchange, all in accordance with the terms of the Cross-Margining Agreement.

831. COMMINGLING OF ELIGIBLE BASE FUTURES AND SWAPS POSITIONS

The Clearing House may identify non-swap Base Guaranty Fund Products that may be commingled with positions in swap Base Guaranty Fund Products in order to provide risk offsets for customer positions if and only if the price risks with respect to such products are significantly and reliably correlated (such products, “Base Eligible Products”). The price risks of different positions will only be considered to be significantly and reliably correlated if there is a theoretical basis for the correlation in addition to an exhibited statistical correlation. Upon such identification, Base Clearing Members may elect that a customer’s positions in Base Eligible Products be commingled in a cleared swaps account. If the Clearing House determines at any time that any Base Eligible Products are non-risk reducing when commingled, the Clearing House may either restrict the commingling of additional Base Eligible Product positions or require moving or liquidating such positions.

List of eligible swaps:
View table here (XLS)

832. FOREIGN CURRENCY MARKET DISRUPTION

In the event a Foreign Currency Market Disruption impacts the ability of the Clearing House and its Clearing Members to meet settlement variation or final settlement obligations in any

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non-U.S. dollar currency for any product cleared by the Clearing House (each, an "Impacted Currency"), the Clearing House and its Clearing Members may transact settlement obligations for each Impacted Currency in U.S. dollars.

The requirement to settle an Impacted Currency obligation in U.S. dollars shall be effective upon notice from the Clearing House. Completion of settlement for an Impacted Currency under the rules of this Chapter will fully discharge each of the Clearing Member's and Clearing House's settlement obligations for that Impacted Currency and settlement cycle. The U.S. dollar rate of exchange shall be based on exchange rates as determined by the Clearing House with reference to exchange rates in the relevant market. The Clearing House will publish the applicable exchange rate on CME Group's website.

A Foreign Currency Market Disruption exists when (i) events not within the Clearing House's control make it illegal or impossible to transact in a foreign currency, (ii) authoritative action such as the adoption of capital controls, asset freezes, imposition of sanctions, nationalization or any other similar action by any governmental entity impedes or is likely to impede the Clearing House's ability to effect settlement transactions in any foreign currency, or (iii) any event with similar effect to the foregoing occurs.

Nothing in this Rule 832 shall in any way limit the authority of the Board, other committees, or other appropriate officials to act in an emergency situation as defined by these Rules.

833.-849. [RESERVED]

MISCELLANEOUS

850. FEES

Exchange fees and/or any transaction surcharges shall be assessed against a clearing member for each side of a transaction traded on, cleared by or processed through the Exchange or the Clearing House as the Board or Exchange staff, as appropriate, may from time to time prescribe. Detailed information concerning these fees is set forth in the Exchange Fee Schedule and applicable Fee Policy Bulletins available on the CME Group website.

851. [RESERVED]

852. SURCHARGES FOR ERRORS, DELAYS AND OMISSIONS

Exchange staff may establish, and from time to time revise, schedules of surcharges to be imposed upon clearing members for errors, delays and omissions with respect to trade data and certain other information required to be provided to the Clearing House. These surcharges are to be collected by the Clearing House and are in addition to any disciplinary sanctions that may be imposed by Market Regulation or the BCC for the violation of Exchange rules.

Appeals of administrative surcharges in excess of $25,000 imposed herein shall be filed with the Market Regulation Department within 10 business days. A written appeal that fails to specify the grounds for the appeal and the specific error or impropriety of the original decision shall be dismissed. The appeal shall be heard by a Panel of the Business Conduct Committee ("BCC Panel") whose decision shall be final and not subject to Rule 411. The appellant shall be entitled to be represented by counsel, appear personally before the BCC Panel and present evidence that they may have in support of their appeal. The BCC Panel shall not set aside, modify or amend the appealed decision unless it determines, by a majority vote, that the decision was:

1. Arbitrary, capricious, or an abuse of discretion; or
2. Based on a clearly erroneous application of Exchange rules.

Notwithstanding the provisions herein, Exchange staff may, at any time, refer matters to the Chief Regulatory Officer where there is a reasonable cause to believe disciplinary action is warranted.

853. TRANSFERS OF TRADES AND CUSTOMER ACCOUNTS

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853.A. Transfers of Trades

1. Subject to the limitations of Rule 854, existing trades may be transferred either on the books of a clearing member or from one clearing member to another clearing member provided:

i. The transfer results in the transfer of a trade(s) from one account to another account with identical beneficial ownership; or

ii. An error has been made in the clearing of a trade(s) and the error is corrected via transfer within three Business Days after the date on which the error occurred; or

iii. The transfer trade is made to reconcile an error, omission or outtrade in accordance with the requirements of Rule 770.

Notwithstanding the foregoing, a transfer may be approved by the Global Head of Clearing or the Chief Compliance Officer of the Clearing House, or their respective designees, in circumstances where it is determined that a transfer trade is the most appropriate means to remedy an error that results from the good faith acts or omissions of any party and the clearing member(s) consent to such transfer, provided that such approval does not result in an impermissible transfer for offset pursuant to the provisions of Rule 854.B. Any request for approval pursuant to this paragraph requires the clearing member(s) to fully document the circumstances of the error and provide that documentation to the Clearing House.

2. Subject to the limitations of Rule 854, the Chief Regulatory Officer or their designee may, (and, with respect to cleared-only products, the Global Head of Clearing or their designee also may), upon request by the clearing member(s), approve a transfer of existing trades either on the books of the same clearing member, or from the books of one clearing member to the books of another clearing member if the transfer is in connection with, or as a result of, a merger, asset purchase, consolidation or similar non-recurring transaction between two or more entities.

3. Subject to the limitations of Rule 854, the Chief Regulatory Officer or their designee may, (and, with respect to cleared-only products, the Global Head of Clearing or their designee also may), upon request by the clearing member(s), approve a transfer of existing trades either on the books of a clearing member or from one clearing member to another member if the transfer involves a partnership, investment fund or commodity pool and the purpose of the transfer is to facilitate a restructuring or consolidation of such partnership, fund or pool, provided that i) the managing partner or pool operator remains the same; ii) the transfer does not result in the liquidation of open positions; and iii) the pro rata allocation of positions to the new account does not result in more than a de minimis change in the value of the interest of any party.

4. Notwithstanding the foregoing, the Chief Regulatory Officer or their designee may, (and, with respect to cleared-only products, the Global Head of Clearing or their designee also may), with the consent of the clearing member(s) involved, permit the transfer and/or offset of existing trades if, in their designee's opinion, the situation so requires and such transfer is in the best interests of the Exchange, which may include, but is not limited to, the remedying of an error resulting from the good faith acts or omissions by a party as a means of avoiding a market disruption. The foregoing does not relieve a clearing member of its responsibility under the Rules for circumstances leading to such transfer and/or offset, and the clearing member may be responsible for demonstrated claims of realized losses incurred by other parties as a result of such errors or omissions in accordance with the provisions of Chapter 6. Additionally, notwithstanding permission for the transfer being granted by the Chief Regulatory Officer or their designee, parties involved in the transfer remain responsible for any violation of Exchange rules resulting from the transfer and may either be summarily sanctioned in accordance with the provisions of Rule 512 or the matter may be referred to the Chief Regulatory Officer for the consideration of charges.

5. Provided that the transfer is permitted pursuant to Sections 1., 2., 3. or 4. above:

   i. Transactions in all physically delivered futures contracts except for FX futures contracts must be recorded and carried on the books of the receiving firm at the original trade dates, with either the original trade price, the current Business Day's settlement price or the prior Business Day's settlement price.

   ii. All other futures and futures-style option transactions may be recorded and carried at:

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(1) the original trade date or the date the transfer is submitted to the Clearing House, with either the original trade price, the current Business Day's settlement price or the prior Business Day's settlement price; or

(2) the Business Day prior to the date the transfer is submitted to the Clearing House, with either the original trade price or the prior Business Day's settlement price.

iii. Premium-style options transactions may be recorded and carried at the original trade date, the date the transfer is submitted to the Clearing House, or the Business Day prior to the date the transfer is submitted to the Clearing House, with either the original trade price, the current Business Day's settlement price, the prior Business Day's settlement price or a trade price of zero.

Trades that have been confirmed at an average price pursuant to the provisions of Rule 553 may alternatively be transferred at the average price.

6. All transfers shall be reported to the Clearing House in a form acceptable to the Exchange for the type of transactions involved. The proper indicator must be included in the transfer such that the transactions, including the transaction(s) to reverse an error, clear as transfers. The clearing member(s) involved shall maintain a full and complete record of all transactions together with all pertinent memoranda.

7. Any authority granted to the Global Head of Clearing or the Chief Compliance Officer of the Clearing House, or their respective designees, set forth in Section A. will not extend to security-based swap products cleared by the Clearing House.

853.B. Transfers of Customer Accounts

Subject to the limitations of Rule 853.A, after receipt of a signed instruction from a Clearing Member (the "Carrying Clearing Member") to transfer all or a portion of a customer account to another Clearing Member (the "Receiving Clearing Member"), and provided that such instruction contains the customer's name and account number (and, if the transfer is not of the entire account, a description of which portion is to be transferred), and provided that the Receiving Clearing Member agrees to accept the account, the Exchange shall promptly transfer the account (or the relevant portion thereof), without requiring any close-out or rebooking of positions in connection with the transfer, provided that:

1. The transferred positions will satisfy Exchange performance bond requirements at the Receiving Clearing Member; and

2. Any remaining positions in the customer account at the Carrying Clearing Member will satisfy Exchange performance bond requirements.

854. CONCURRENT LONG AND SHORT POSITIONS

Set forth below are the procedures that must be followed for concurrent long and short positions and hold-open accounts.

A. Concurrent long and short positions in the same commodity and month may be held by a clearing member at the direction of a customer or on behalf of an omnibus account; however it shall be the duty of the clearing member to ascertain whether such positions are intended for offset or to be held open prior to final transmission of position data to the Clearing House.

B. Concurrent long and short positions in physically delivered contracts subject to spot month position limits that are held by the same owner during the time that spot month position limits are in effect must be offset by transactions executed in the market, by allowable privately negotiated transactions, or fulfilled through the normal delivery process, provided however that trades may be offset via netting, transfer or position adjustment to correct a bona fide clerical or operational error on the day the error is identified and the quantity of the offset does not represent more than two percent of the reported open interest in the affected futures contract month.

Permissible Exceptions

Notwithstanding the foregoing:

1. Trades may be transferred for offset if the trade date of the position being transferred is the same as the transfer date;

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2. An account that becomes concurrently long and short as a result of a futures position that results from an option assignment will be allowed one business day to net such positions; or,
3. Where the Chief Regulatory Officer or their designee determines, in their respective sole discretion, that permitting an offset via netting, transfer or position adjustment in excess of two percent of the reported open interest will not adversely impact either the affected market or any persons holding open positions in the affected market.

C. Clearing members which, pursuant to this rule, carry concurrent long and short positions, must report to the Exchange both sides as open positions. When either side or both sides are reduced, the open positions as reported to the Exchange must be reduced accordingly, and, pursuant to Rule 806, may not subsequently be re-opened at the Exchange.

D. The Exchange takes no position regarding the internal bookkeeping procedures of its clearing members which, for the convenience of a customer, may "hold open" a position only on their books. However, the clearing member must accurately report to the Exchange and the Clearing House, as appropriate, large trader positions, long positions eligible for delivery and open interest.

E. Violations of this Rule may result in summary sanctions in accordance with the provisions of Rule 512 or the matter may be referred to the Chief Regulatory Officer for the consideration of charges.

855. OFFSETTING POSITIONS FOR DIFFERENT-SIZED CONTRACTS[1]

With the consent of the account controller, a clearing member may offset long futures positions against short futures positions, or short futures positions against long futures positions, held in the same account in the ratios set forth in the Contracts Eligible for Offset Table ("Table") at the end of Chapter 8.

With the consent of the account controller, a clearing member may offset long options on futures positions against short options on futures positions, or short options on futures positions against long options on futures positions, held in the same account in the ratios set forth in the Table, provided that the options to be netted have European exercise, the same expiration date, and the same exercise price.

The clearing member shall notify the Clearing House of offsetting positions by submitting reports to the Clearing House in such form and manner as the Clearing House shall specify. The positions shall be offset at the previous day's settlement price for futures and at a price of zero for options.

The positions being offset shall be transferred to a holding account at the Clearing House. Offsetting positions in the same contract and contract month held in the holding account shall be netted, thus reducing the number of open positions in such contract.

856. NORMALIZATION OF OTC FX SPOT, FORWARD, SWAP AND OPTIONS TRANSACTIONS FOR CLEARING[2]

For over-the-counter (OTC) foreign exchange (FX) transactions submitted for clearing and any non-standard specification of the transaction as defined by the price format shall be normalized by CME Group Clearing to standard or normal specifications by the following "normalization process."

Instrument: Currency 1/Currency 2 (CCY1/CCY2)

Generically, for spot and forward OTC FX transactions…

Standard or Normal: Buy (B)/Sell (S) CCY1 notional amount at CCY2 per CCY1 rate.

Non-standard or Non-normal: B/S CCY2 notional amount at CCY2 per CCY1 rate.

To normalize:
1. Convert B to S, or S to B
2. Convert CCY2 notional to CCY1: CCY2 amount divided by CCY2 per CCY1 rate to obtain CCY1 amount.

For example, for Instrument: EUR/USD …

Standard: EUR/USD- Quote USD per EUR; notional amount in EUR

[1] Revised September 2008; March 2009; September 2010; December 2010; January 2013; December 2016; April 2019.
[2] Adopted April 2011.

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Trade comes in as SELL €15 million at 1.350000 USD per EUR →BUY $20,250,000 (€15 million x 1.350000 USD/EUR)

Non-standard: EUR/USD- Notional amount in USD, but quote still in USD per EUR.

Trade comes in as buy $20 million at 1.350000 USD per EUR →SELL €14,814,814.81 ($20 million / 1.350000 USD/EUR).

To normalize the non-standard EUR/USD transaction, CME Clearing shall:

3. Convert Buy to Sell, or Sell to Buy
4. Convert USD notional to EUR: USD amount divided by USD per EUR rate.

Example: The trade "BUY $20 million at 1.350000 ⇨SELL €14,814,814.81 ($20/1.350000) at 1.350000 USD per EUR" shall be normalized and held in CME Clearing as:

The trade "SELL €14,814,814.81 ($20/1.350000) at 1.350000 USD per EUR⇨ BUY $20 million at 1.350000."

For swap OTC FX transactions, …

Standard or Normal: Leg 1 B/S CCY1 notional amount at $CCY2_t$ per CCY1 rate.

Leg 2 S/B CCY1 notional amount at $CCY2_{t+n}$ per CCY1 rate.

Non-standard or Non-normal:

Leg 1 B/S CCY2 notional amount at $CCY2_t$ per CCY1 rate.

Leg 2 S/B CCY2 notional amount at $CCY2_{t+n}$ per CCY1 rate.

To normalize:

1. Convert B to S, or S to B
2. Convert CCY2 notional to CCY1: CCY2 amount divided by CCY2 per CCY1 rate to obtain CCY1 amount.

For example, for instrument: EUR/USD…

Standard: Leg 1 EUR/USD- Quote USD per EUR; notional amount in EUR

Leg 2 EUR/USD- Quote USD per EUR; notional amount in EUR

Trade comes in as "Leg 1 BUY €20 million at 1.305000 ⇨SELL $26,100,000 ($20 million x 1.305000) at 1.305000 USD per EUR; Leg 2 SELL €20 million at 1.315000 USD per EUR (1.3050 + 0.0100 swap points)"

Non-Standard: Leg 1 EUR/USD- Notional amount in USD, but quote still in USD per EUR.

Leg 2 EUR/USD- Notional amount in USD, but quote still in USD per EUR.

Trade comes in as "Leg 1 SELL $26.1 million at 1.305000 ⇨BUY €20 million ($26.1 million / 1.305000) at 1.305000 USD per EUR; Leg 2 BUY $26.3 million at 1.315000 USD per EUR (1.3050 + 0.0100 swap points)."

To normalize the non-standard EUR/USD transaction, CME Clearing shall:

3. Convert Buy to Sell, or Sell to Buy
4. Convert USD notional to EUR: USD amount divided by USD per EUR rate.

Example: The trade "Leg 1 SELL $26.1 million at 1.305000 ⇨BUY €20 million ($26.1 million / 1.305000) at 1.305000 USD per EUR; Leg 2 BUY $26.3 million at 1.315000 USD per EUR (1.3050 + 0.0100 swap points)" shall be normalized and held in CME Clearing as:

The trade "Leg 1 BUY €20 million at 1.305000 ⇨SELL $26,100,000 ($20 million x 1.305000) at 1.305000 USD per EUR; Leg 2 SELL €20 million at 1.315000 USD per EUR (1.3050 + 0.0100 swap points)"

For option OTC FX transactions, …

Standard or Normal: B/S CCY1/CCY2 CALL (PUT) at STRIKE PRICE in units of CCY2 per CCY1 for a notional amount of CCY1 for a premium in CCY2 (CCY1 amount x premium price in CCY2 per CCY1, that is, CCY2 pips) or % of CCY1 (CCY1 premium / CCY1 notional amount).

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Non-standard or Non-normal: B/S CCY1/CCY2 CALL (PUT) at STRIKE PRICE in units of CCY2 per CCY1 for a notional amount of CCY2 for a premium in CCY1 (CCY2 amount / premium price in CCY2 per CCY1, that is, CCY1 pips) or % of CCY2 (CCY2 premium / CCY2 notional amount).

To normalize:

1. Retain B/S direction
2. Convert CCY2 Put to CCY1 Call, CCY2 Call to CCY1 Put
3. Convert CCY2 notional to CCY1: CCY2 amount divided by Strike Price expressed in CCY2 per CCY1.
4. Process original premium amount and currency.
5. Take premium amount and divide by CCY1 notional to express price in CCY1 terms for reference purposes.

For example, for Instrument: EUR/USD …

Standard: EUR/USD- Quote USD per EUR; notional amount in EUR, premium in either % of EUR notional (EUR premium) or USD pips (USD premium).

Trade comes in as BUY EUR/USD PUT at 1.350000 USD per EUR for a notional amount of €20 million with premium of $100,000 (€20 million x option price of 0.0050 USD per EUR, that is, USD pips) or 1.0% of €20 million (€200,000 premium / €20 million) → SELL EUR/USD PUT at 1.350000 USD per EUR for a notional amount of €20 million with premium of $100,000 (€20 million x option price of 0.0050 USD per EUR, that is, USD pips) or 1.0% of €20 million (€200,000 premium / €20 million).

Non-standard: EUR/USD- Notional amount in USD, but quote still in USD per EUR, premium in either % of USD notional (USD premium) or EUR pips (EUR premium).

Trade comes in as BUY EUR/USD PUT at 1.350000 USD per EUR for a notional amount of $20 million with premium of €170,100 ($20 million x option price of 0.008505 EUR per USD, that is, EUR pips) or 1.0% of $20 million ($200,000 premium / $20 million) → SELL EUR/USD PUT at 1.350000 USD per EUR for a notional amount of $20 million with premium of €170,100 ($20 million x option price of 0.008505 USD per EUR, that is, EUR pips) or 1.0% of $20 million ($200,000 premium / $20 million).

To normalize the non-standard EUR/USD transaction, CME Clearing shall:

6. Retain B/S direction
7. Convert USD Put to EUR Call, USD Call to EUR Put
8. Convert USD notional to EUR: USD amount divided by Strike Price expressed in USD per EUR.
9. Process original premium amount and currency.

a. Take premium amount and divide by EUR notional to express price in EUR terms for reference purposes.

Example: Trade comes in as BUY EUR/USD PUT at 1.350000 USD per EUR for a notional amount of $20 million with premium of €170,100 ($20 million x option price of 0.008505 EUR per USD, that is, EUR pips) or 1.0% of $20 million ($200,000 premium / $20 million) → SELL EUR/USD PUT at 1.350000 USD per EUR for a notional amount of $20 million with premium of €170,100 ($20 million x option price of 0.008505 USD per EUR, that is, EUR pips) or 1.0% of $20 million ($200,000 premium / $20 million) shall be normalized and held in CME Clearing as:
BUY EUR/USD CALL at 1.350000 USD per EUR for a notional amount of €14,814,814.81 ($20 million/1.350000 USD per EUR) with a premium of €170,100 ($20 million x option price of 0.008505 EUR per USD, that is, EUR pips) or 1.148% of €14,814,814.81 (€170,100 / €14,814,814.81).

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857. POST-TRADE MULTILATERAL COMPRESSION

The Clearing House may from time to time and in its absolute and sole discretion provide a multilateral compression service under which eligible Exchange futures and options contracts cleared through the Clearing House may be offset (closed-out) and, where relevant, replaced with new Exchange futures and options contracts cleared through the Clearing House.

With the consent of the account controller, a Clearing Member, account controller or person duly authorized by the Clearing Member or account controller may submit a list of positions in eligible contracts which remain open at the Clearing House pursuant to Rule 805 and that the account controller wishes to offset (close-out) and replace with new contracts via the multilateral compression service in accordance with this Rule.

The specific products and contract months eligible for inclusion in the multilateral compression service and the frequency and timing of providing such service will be determined by the Clearing House in its absolute and sole discretion.

All contracts submitted to the Clearing House pursuant to this Rule must be submitted in accordance with the procedures established by the Clearing House for this purpose as amended from time to time.

Clearing Members participating in the multilateral compression service agree and acknowledge that the multilateral compression service may operate to offset (close-out) certain existing open positions and establish new open positions for the benefit of the relevant account holder. Any termination of or entry into replacement Exchange cleared futures and options contracts will take place in accordance with and subject to the terms of this Rule and such procedures and conditions established by the Clearing House from time to time.

The Clearing House may utilize a third party approved by the Clearing House for the facilitation of the multilateral compression service provided in accordance with this Rule, which may be an affiliate of the Clearing House or CME Group Inc. or such other entity appointed by the Clearing House from time to time and duly notified to participants (an “Authorized Compression Service Provider”).

The Clearing House may in its absolute and sole discretion determine to suspend or terminate the multilateral compression service and any compression cycle at any time.

Positions in a customer account of a Clearing Member shall not be compressed pursuant to this Rule with positions in the proprietary account of the Clearing Member.

CONTRACTS ELIGIBLE FOR OFFSET TABLE

View table here (XLS)

(End Chapter 8)

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Chapter 8A
Mutual Offset System

8A70. SCOPE OF SECTION

This section governs the rights and responsibilities of clearing members participating in the Mutual Offset System. The procedures for trading, clearing, etc., including the duties of a clearing member to its customer and the rights of such customer that are not specifically covered herein shall be governed by the rules of the Exchange that are consistent with this section.

8A71. CONTRACT ELIGIBILITY [1]

The Mutual Offset System may be utilized for the following futures contracts: Nikkei Stock Average, Yen Denominated Nikkei Stock Average, E-mini FTSE China 50, and E-mini FTSE Emerging Index.

8A72. DEFINITIONS

8A72.A. Mutual Offset System.

The process of substitution between Participating Exchanges whereby a trade executed on one exchange liquidates or establishes a position on another such exchange.

8A72.B. Inter-Exchange Transfer.

The transfer to one Participating Exchange of a position established as a result of a trade on another Participating Exchange.

8A72.C. Participating Exchange. [2]

An exchange that is a party to the Mutual Offset System. (Chicago Mercantile Exchange Inc. and the Singapore Exchange Derivatives Trading Limited are parties to the Mutual Offset System.)

8A72.D. Originating Clearing Member.

A clearing member of a Participating Exchange that initiates an order for execution pursuant to the Mutual Offset System.

8A72.E. Executing Clearing Member.

A clearing member of a Participating Exchange that accepts and is responsible for executing an order received from an Originating Clearing Member pursuant to the Mutual Offset System.

8A73. CLEARING MEMBER ELIGIBILITY [3]

A clearing member of the Exchange may not participate in the Mutual Offset System as an Originating or Executing Clearing Member unless it has been approved by Exchange staff. Exchange staff shall have the sole discretion in determining the qualifications of an applicant for participation in the Mutual Offset System. If Exchange staff has reason to believe that the continued participation of a clearing member in the Mutual Offset System may, or has the potential to, adversely affect the Exchange or the Mutual Offset System, the Clearing House Risk Committee may summarily revoke the approval. The clearing member shall be entitled to a hearing within 10 days of such revocation.

A violation of this Rule may be a major offense.

8A74. CUSTOMER AUTHORIZATION [4]

A. All orders for execution on another Participating Exchange shall be deemed to be for the Mutual Offset System and the resulting position shall be automatically transferred to the Exchange unless upon receipt of an order the clearing member receives instructions to the contrary.

B. Non-discretionary orders for execution on the Exchange shall not be transferred to a Participating Exchange unless specifically authorized by the account holder in accordance with

[1] Revised June 1986; July 1994; February 1996; July 1998; March 1999; August 2004; June 2011; January 2017; July 2018; December 2019.
[2] Revised November 2000.
[3] Revised November 2000.
4 Revised July 1986; December 1986; March 1988; December 1993.

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CFTC Regulation 166.2.

C. A violation of this rule may be a major offense.

8A75. INTER-EXCHANGE MEMORANDUM

All trades originated or executed subject to the Mutual Offset System shall be promptly reported to and on a form of memorandum provided by the Clearing House.

8A76. PREREQUISITES FOR INTER-EXCHANGE TRANSFER

So long as the Mutual Offset System is in effect, a trade will be transferred between Participating Exchanges if all of the following conditions are satisfied:

1. The trade has cleared in the ordinary course on the Participating Exchange where executed.
2. An Inter-Exchange Transfer memorandum has been duly delivered to the Clearing House.
3. The Clearing House has received confirmation of the Inter- Exchange trade data from the other Participating Exchange.

8A77. INTER-EXCHANGE TRANSFER

8A77.A. Clearing Members

The Executing Clearing Member with respect to a trade executed on CME pursuant to the Mutual Offset System shall have the same responsibilities to the Clearing House for such trade as for any other trade made on CME until the trade is transferred to a Participating Exchange.

After a trade executed on CME is transferred to another Participating Exchange, the Executing Clearing Member shall have no further responsibility to the Clearing House for such trade and shall have no further responsibility to or relationship with the Originating Clearing Member with respect to the position created by such trade.

After a trade executed on a Participating Exchange, other than CME, is transferred to CME, the Originating Clearing Member shall have no further responsibility to or relationship with the Executing Clearing Member of the other Participating Exchange with respect to the position created by the trade, and the Originating Clearing Member shall have a position on CME and the same responsibilities to the Clearing House for such position as it would have had if the trade creating the position had been executed on CME.

8A77.B. Other Participating Exchanges

At such time as a trade executed on CME is transferred to another Participating Exchange, the other Participating Exchange shall be substituted for the Executing Clearing Member with respect to the position created by such trade.

At such time as a trade executed on a Participating Exchange, other than CME, is transferred to CME, the other Participating Exchange will have a position equal and opposite to such position subject to the Inter-Exchange Transfer.

8A78. TRADE NOT TRANSFERRED BETWEEN PARTICIPATING EXCHANGES

If a trade executed on the CME is not transferred between Participating Exchanges prior to the opening of trading on the next business day, the Executing Clearing Member shall remain responsible to the Clearing House to the full extent as with any trade.

(End Chapter 8-A)

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INTERPRETATIONS & SPECIAL NOTICES RELATING TO CHAPTER 8-A

REPEAL OF RULE 879

(Special Executive Report S-1575, December 9, 1985)

The CFTC has approved the repeal of Rule 879 OMNIBUS ACCOUNT RESTRICTIONS. The repeal is effective immediately.

Rule 879 had prohibited clearing members from accepting or carrying positions executed pursuant to the Mutual Offset System in an omnibus account of a non-member FCM, unless the account was a proprietary account of the non-member FCM. The repeal of the rule means that clearing members may accept and carry positions executed through the mutual offset system in an omnibus account of a non-member firm.

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Chapter 8B
Security Futures Products

GENERAL

8B01. SCOPE OF CHAPTER

This chapter is limited in application to the clearance of Security Futures Products ("SFPs") effected on a Marketplace apart from the Chicago Mercantile Exchange where the underlying interest is a single equity security or a narrow-based index. The procedures for clearing, delivery, settlement and other matters not specifically covered herein shall be governed by the Rules of the Exchange.

For purposes of Chapter 8B, the term Marketplace shall mean an organized venue, apart from Chicago Mercantile Exchange Inc., for the trade of securities, commodities or derivative instruments including, but not limited to, futures, options, options on futures or Security Futures Products.

8B02. CONDITIONS TO CLEAR SECURITY FUTURES PRODUCTS

The Chicago Mercantile Exchange Clearing House will clear transactions in Security Futures Products effected on a Marketplace apart from the Chicago Mercantile Exchange subject to the execution of a clearing agreement between the Marketplace and the Clearing House, which agreement shall, among other things: (a) govern the business relationship between such Marketplace and the CME in respect of the listing of, and clearance of transactions in, Security Futures Products, (b) provide for appropriate indemnification by the Marketplace of the CME, its officers, and directors, and (c) provide that the CME shall cease clearing Security Futures Products for the Marketplace and the clearing agreement shall terminate if: (i) the Marketplace no longer meets all legal and regulatory requirements necessary to list and trade Security Futures Products; (ii) the Marketplace terminates the trading of all Security Futures Products; or (iii) the Marketplace is in violation, in any material respect, of the clearing agreement.

INTERPRETATION TO RULE 8B02 CONDITIONS TO CLEAR SECURITY FUTURES PRODUCTS

The Clearing House will clear transactions effected on the Marketplace only if such Marketplace has received all necessary regulatory authorization to trade the particular types of contracts subject to such transactions.

8B03. GENERAL RIGHTS AND OBLIGATIONS

Each buyer and seller of a SFP shall have the rights and obligations provided in the Rules. In the case of Security Futures Products traded on a Marketplace apart from Chicago Mercantile Exchange but cleared by the Clearing House per the provisions of Rule 8B02, each buyer and seller of a SFP shall have the rights and obligations provided in the applicable rules, by-laws or regulations governing trade on such Marketplace.

8B04. PARTNER CLEARINGHOUSES

1. The Clearing House may agree with a Partner Clearinghouse to open one or more omnibus accounts for such Partner Clearinghouse for the purpose of facilitating trade in Security Futures Products. The terms of such an arrangement shall be set forth in a separate written agreement, which shall provide, *inter alia*, that the Partner Clearinghouse shall be a Clearing Member in respect of the omnibus account(s) for purposes of the Rules, except to the extent otherwise provided in such agreement, and shall be primarily liable for the obligations of its clearing members in respect of trades cleared through the omnibus account(s).

2. Neither the Clearing House nor Partner Clearinghouse, in respect of SFP transactions, shall be required to (a) post risk margin with the other; (b) make payment or post any deposit to the other party's guaranty fund or clearing fund; or (c) make up or contribute to the restoration of any loss suffered by the other party as a result of a default to such other

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party by such other party's clearing members.

3. The Clearing House shall assume all obligations, as specified in the Rules, to Clearing Members clearing SFP transactions through the Clearing House. Similarly, Partner Clearinghouse(s) shall be bound by their respective rules and by-laws to parties clearing SFP transactions through the facilities of the Partner Clearinghouse. However, the Clearing House shall not assume any direct obligations to parties clearing SFP transactions through the facilities of its Partner Clearinghouse(s). Similarly, Partner Clearinghouse(s) shall not assume any direct obligations to parties clearing SFP transactions through the facilities of the Clearing House.

8B05. TRANSFERS WITH PARTNER CLEARINGHOUSES

A. Clearing Members

Trades or positions may be transferred from accounts carried at CME to accounts carried at a Partner Clearinghouse; or, from accounts carried at a Partner Clearinghouse to accounts carried at CME. Such transfers shall be made by the Transferring Clearing Member to the Accepting Clearing Member. Such transfers must be made at the daily settlement value per Rule 813.F.

The Transferring Clearing Member with respect to a trade executed on a Marketplace and cleared by CME shall have the same responsibilities to the Clearing House for such trade as for any other trade made, or position carried, on CME until the trade is transferred to a Partner Clearinghouse.

After a trade originally cleared at CME is transferred to a Partner Clearinghouse, the Transferring Clearing Member shall have no further responsibility for such trade and shall have no further responsibility to or relationship with the Accepting Clearing Member with respect to the position created by such trade.

After a trade originally cleared by a Partner Clearinghouse is transferred to CME, the Accepting Clearing Member shall have no further responsibility to or relationship with the Transferring Clearing Member of the Partner Clearinghouse with respect to the position created by the trade, and the Accepting Clearing Member shall have a position on CME and the same responsibilities to the Clearing House for such position as it would have had if the trade creating the position had been originally cleared on CME.

B. Other Partner Clearinghouses

At such time as a trade cleared on CME is transferred to another Partner Clearinghouse, the Partner Clearinghouse shall be substituted for the Transferring Clearing Member with respect to the position created by such trade.

At such time as the trade originally cleared on a Partner Clearinghouse, other than CME is transferred to CME, the Partner Clearinghouse will have a position equal and opposite to such position subject to the Transfer between CME and a Partner Clearinghouse.

8B06. TRADE NOT TRANSFERRED BETWEEN PARTNER CLEARINGHOUSES

If a trade originally cleared on CME is not transferred to a Partner Clearinghouse prior to the opening of trading on the next business day, the Transferring Clearing Member shall remain responsible to the CME to the full extent as with any trade.

ADJUSTMENTS

8B10. ADJUSTMENTS TO SECURITY FUTURES PRODUCTS

1. Determinations as to whether and how to adjust the terms of Security Futures Products to reflect events affecting underlying interests shall be made by the Clearing House based on its judgment, and in coordination with Partner Clearinghouses as appropriate, as to what is appropriate for the protection of investors and the public interest, taking into account such factors as fairness to the buyers and sellers of Security Futures Products on the underlying interest, the maintenance of a fair and orderly market in futures on the underlying interest, consistency of interpretation and practice, efficiency of settlement of delivery obligations arising from physically-settled Security Futures Products, and the

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coordination with other clearing agencies of the clearance and settlement of transactions in the underlying security. The Clearing House may, in addition to determining adjustments to Security Futures Products on a case-by-case basis, adopt interpretations having general application to specified types of events. Every determination by the Clearing House in respect of Security Futures Products pursuant to this Rule shall be within the discretion of the Clearing House, in coordination with Partner Clearinghouses as appropriate, and shall be conclusive and binding on all investors and not

2. [subject to review]. The following paragraphs of this Rule apply to Security Futures Products based on single equity securities only. Special rules for narrow-based index futures are set out in Rule 8B11.

3. Whenever there is a dividend, stock dividend, stock distribution, stock split, reverse stock split, rights offering, distribution, reorganization, recapitalization, reclassification or similar event in respect of any underlying security, or a merger, consolidation, dissolution or liquidation of the issuer of any underlying security, the number of Security Futures Product contracts, the unit of trading, the settlement price and the underlying security, or any of them, with respect to all outstanding Security Futures Products open for trading in the underlying security may be adjusted in accordance with this Rule. If the Clearing House does not learn, or does not learn in a timely manner, of an event for which the Clearing House would have otherwise made an adjustment, the Clearing House shall not be liable for any failure to make such adjustment or delay in making such adjustment. In making any adjustment determination, the Clearing House shall apply the factors set forth in this Rule in light of the circumstances known to it at the time such determination is made.

4. It shall be the general rule that there will be no adjustments to reflect ordinary cash dividends or distributions or ordinary stock dividends or distributions (collectively, "ordinary distributions") by the issuer of the underlying security.

5. Subject to paragraph 3 of this Rule, it shall be the general rule that in the case of a stock dividend, stock distribution or stock split whereby one or more whole numbers of shares of the underlying security are issued with respect to each outstanding share, each SFP contract covering that underlying security shall be increased by the same number of additional SFP contracts as the number of shares issued with respect to each share of the underlying security, the last settlement price established immediately before such event shall be proportionately reduced, and the unit of trading shall remain the same.

6. Subject to paragraph 3 of this Rule, it shall be the general rule that in the case of a stock dividend, stock distribution or stock split whereby other than a whole number of shares of the underlying security is issued in respect of each outstanding share, the last settlement price established immediately before such event shall be proportionately reduced, and conversely, in the case of a reverse stock split or combination of shares, the last settlement price established immediately before such event shall be proportionately increased. Whenever the settlement price with respect to a stock future has been reduced or increased in accordance with this paragraph, the unit of trading shall be proportionately increased or reduced, as the case may be.

7. It shall be the general rule that in the case of any distribution made with respect to shares of an underlying security, other than ordinary distributions and other than distributions for which adjustments are provided in paragraphs 4 or 5 of this Rule, if the Clearing House determines that an adjustment to the terms of Security Futures Products on such underlying security is appropriate, (a) the last settlement price established immediately before such event shall be reduced by the value per share of the distributed property, in which event the unit of trading shall not be adjusted, or alternatively, (b) the unit of trading in effect immediately before such event shall be adjusted so as to include the amount of property distributed with respect to the number of shares of the underlying security represented by the unit of trading in effect prior to such adjustment, in which event the settlement price shall not be adjusted. The Clearing House shall, with respect to adjustments under this paragraph or any other paragraph of this Rule, have the authority to determine the value of distributed property.

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8. In the case of any event for which adjustment is not provided in any of the foregoing paragraphs of this Rule, the Clearing House may make such adjustments, if any, with respect to the Security Futures Products affected by such event as the Clearing House determines.

9. Adjustments pursuant to this Rule shall as a general rule become effective in respect of outstanding Security Futures Products on the "ex-date" established by the primary market for the underlying security.

10. It shall be the general rule that (a) all adjustments of the settlement price of an outstanding stock future shall be rounded to the nearest adjustment increment, (b) when an adjustment causes a settlement price to be equidistant between two adjustment increments, the settlement price shall be rounded up to the next highest adjustment increment, (c) all adjustments of the unit of trading shall be rounded down to eliminate any fraction, and (d) if the unit of trading is rounded down to eliminate a fraction, the adjusted settlement price shall be further adjusted, to the nearest adjustment increment, to reflect any diminution in the value of the stock future resulting from the elimination of the fraction.

11. Notwithstanding the general rules set forth in paragraphs 3 through 9 of this Rule or which may be set forth as interpretations to this Rule, the Clearing House shall have the power to make exceptions in those cases or groups of cases in which, in applying the standards set forth in paragraph 1 of this Rule, the Clearing House shall determine such exceptions to be appropriate. However, the general rules shall be applied unless the Clearing House affirmatively determines to make an exception in a particular case or group of cases.

INTERPRETATION TO RULE 8B10. ADJUSTMENTS TO SECURITY FUTURES PRODUCTS

1. (a) Cash dividends or distributions by the issuer of the underlying security that the Clearing House believes to have been declared pursuant to a policy or practice of paying such dividends or distributions on a quarterly or other regular basis, will, as a general rule, be deemed to be “ordinary distributions” within the meaning of paragraph 3 of this Rule. The Clearing House will determine on a case-by-case basis whether other dividends or distributions are “ordinary distributions” or whether they are dividends or distributions for which an adjustment should be made. (b) Stock dividends or distributions by the issuer of the underlying security that the Clearing House believes to have been declared pursuant to a policy or practice of paying such dividends or distributions on a quarterly basis will, as a general rule, be deemed to be “ordinary distributions” within the meaning of paragraph 3 of this Rule. The Clearing House will ordinarily adjust for other stock dividends and distributions. (c) Where the Clearing House determines to adjust for a cash or stock dividend or distribution, the adjustment shall be made in accordance with the applicable provisions of this Rule.

2. Adjustments will ordinarily be made for rights distributions, except as provided below in the case of certain “poison pill” rights. When an adjustment is made for a rights distribution, the unit of trading in effect immediately prior to the distribution will ordinarily be adjusted to include the number of rights distributed with respect to the number of shares or other units of the underlying security comprising the unit of trading. If, however, the Clearing House determines that the rights are due to expire before the time they could be exercised upon delivery under the futures contract, then delivery of the rights will not be required. Instead, the Clearing House will ordinarily adjust the last settlement price established before the rights expire to reflect the value, if any, of the rights as determined by the Clearing House in its sole discretion. Adjustments will not ordinarily be made to reflect the issuance of so-called “poison pill” rights that are not immediately exercisable, trade as a unit or automatically with the underlying security, and may be redeemed by the issuer. In the event such rights become exercisable, being to trade separately from the underlying security, or are redeemed, the Clearing House will determine whether an adjustment is appropriate.

3. Adjustments will not be made to reflect a tender offer or exchange offer to the holders of

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the underlying security, whether such offer is made by the issuer of the underlying security or by a third person or whether the offer is for cash, securities or other property. This policy will apply without regard to whether the price of the underlying security may be favorably or adversely affected by the offer or whether the offer may be deemed to be "coercive." Outstanding Security Futures Products ordinarily will be adjusted to reflect a merger, consolidation or similar event that becomes effective following the completion of a tender offer or exchange offer.

4. Adjustments will not be made to reflect changes in the capital structure of an issuer where all of the underlying securities outstanding in the hands of the public (other than dissenters' shares) are not changed into another security, cash or other property. For example, adjustments will not be made merely to reflect the issuance (except as a distribution on an underlying security) of new or additional debt, stock, or options, warrants or other securities convertible into or exercisable for the underlying security, the refinancing of the issuer's outstanding debt, the repurchase by the issuer of less than all of the underlying securities outstanding, or the sale by the issuer of significant capital assets.

5. When an underlying security is converted into a right to receive a fixed amount of cash, such as in a merger, outstanding Security Futures Products will be adjusted to replace such underlying security with such fixed amount of cash as the underlying interest, and the unit of trading shall remain unchanged.

6. In the case of a corporate reorganization, reincorporation or similar occurrence by the issuer of an underlying security which results in an automatic share-for-share exchange of shares in the issuer for shares in the resulting company, Security Futures Products on the underlying security will ordinarily be adjusted by replacing such underlying security with a like number of units of the shares of the resulting company. Because the securities are generally exchanged only on the books of the issuer and the resulting company, and are not generally exchanged physically, deliverable shares will ordinarily include certificates that are denominated on their face as shares in the original issuer, but which, as a result of the corporate transaction, represent shares in the resulting company.

7. When an underlying security is converted in whole or in part into a debt security and/or a preferred stock, as in a merger, and interest or dividends on such debt security or preferred stock are payable in the form of additional units thereof, outstanding Security Futures Products that have been adjusted by replacing the original underlying security with the security into which the original underlying security has been converted shall be further adjusted, effective as of the ex-date for each payment of interest or dividends thereon, by increasing the unit of trading by the number of units of the new underlying security distributed as interest or dividends thereon.

8. Notwithstanding this Interpretation of Rule 8B10, distributions of short-term and long-term capital gains in respect of stock fund shares by the issuer thereof shall not, as a general rule, be deemed to be "ordinary dividends or distributions" within the meaning of paragraph 3 of Rule 8B10, and adjustments of the terms of Security Futures Products on such stock fund shares for such distributions shall be made in accordance with paragraph applicable provisions of Rule 8B10, unless the Clearing House determines, on a case-by-case basis, not to adjust for such a distribution.

9. In the event that a new series of Security Futures Products is introduced with a settlement price expressed in decimals and there is an outstanding series of Security Futures Products on the same underlying security with a settlement price expressed as a fraction that could be expressed in whole cents, the Clearing House may restate the settlement price of the outstanding series as its equivalent decimal price. If the settlement price for the outstanding series is a fraction that cannot be expressed in whole cents, the settlement price may not be restated as a decimal.

8B11. ADJUSTMENTS TO NARROW-BASED INDEX FUTURES

1. No adjustments will ordinarily be made in the terms of narrow-based index futures in the

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event that underlying securities are added to or deleted from the index group or when the relative weight of one or more underlying securities in the index is changed. However, if the Clearing House shall determine in its discretion, and in coordination with Partner Clearinghouses as appropriate, that any such addition, deletion or change causes significant discontinuity in the level of the index, the Clearing House may adjust the terms of the affected narrow-based index futures by adjusting the index multiplier with respect to such contracts or by taking such other action as the Clearing House in its discretion, and in coordination with its Partner Clearinghouses as appropriate, deems fair to both the buyers and sellers of such contracts.

2. If (a) the index multiplier for narrow-based index futures on an underlying index shall be increased or decreased, (b) the reporting authority shall change the method of calculation of an underlying index so as to create a discontinuity or change in the level of the index that does not reflect a change in the prices or values of the constituent securities in the index, or (c) the Clearing House shall substitute one underlying index for another pursuant to paragraph 3 of this Rule, the Clearing House shall make such adjustments in the number of outstanding futures or the contract prices of such futures or other such adjustments, if any, as the Clearing House in its discretion, and in coordination with Partner Clearinghouse(s) as appropriate, deems fair to both the buyers and the sellers of such contracts.

3. In the event the Clearing House determines that (a) publication of an underlying index has been discontinued; (b) an underlying index has been replaced by another index; or (c) the composition or method of calculation of an underlying index is so materially changed since its selection as an underlying index that is deemed to be a different index, the Clearing House may substitute another index (a "successor index") as the underlying index. A successor index shall be reasonably comparable, as determined by the Corporation in its discretion, and in coordination with Partner Clearinghouse(s) as appropriate, to the original underlying index for which it is substituted. An index may be created specifically for the purpose of becoming a successor index.

4. (a) In the event the Clearing House, acting pursuant to paragraph 1 of this Section, adjusts a narrow-based index futures contract underlying a futures option, such futures option will ordinarily be adjusted to provide, upon exercise, for delivery of the futures contract as adjusted by the Clearing House. (b) In the event the Clearing House, acting pursuant to paragraph 2 of this Section, adjusts (i) the number of outstanding index futures in a series of futures underlying a futures option, (ii) the contract price of index futures underlying a futures option, or (iii) the index futures underlying a futures option in any other manner, the futures option ordinarily will be adjusted in the manner corresponding to the adjustment in the underlying futures contract (e.g., if the number of outstanding index futures in a series of futures underlying a futures option is adjusted, the number of futures options on the adjusted underlying index will be similarly adjusted; if the contract price of the underlying index future is adjusted, the exercise price of the futures options will be similarly adjusted, etc.

SETTLEMENT

8B20. UNAVAILABILITY OR INACCURACY OF FINAL SETTLEMENT PRICE

1. If the Clearing House shall determine, in coordination with Partner Clearinghouse(s) as appropriate, that the primary market(s) for the underlying security in respect of a maturing stock future, or one or more component securities of the underlying index in respect of a maturing narrow-based index future, did not open or remain open for trading at or before the time when the final settlement price for such futures would ordinarily be determined, or that the price or other value used to determine the final settlement price is unreported or otherwise unavailable, then, in addition to any other actions that the Clearing House may be entitled to take under the Rules, the Clearing House shall be empowered to do any or all of the following with respect to maturing futures affected by such event ("affected futures"):

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(a) The Clearing House may suspend the time for making the final variation payment with respect to affected futures and, in the case of physically-settled Security Futures Products, may postpone the delivery date. At such time as the Clearing House determines that the required price or other value is available or the Clearing House has fixed the final settlement price pursuant to subparagraph (a) or (b) of this Section, the Clearing House shall fix a new date for making the final variation payment and may fix a new delivery date for physically-settled Security Futures Products.

(b) The Clearing House may fix the final settlement price for affected futures, based on its judgment as to what is appropriate for the protection of investors and the public interest, taking into account such factors as fairness to buyers and sellers of affected futures, the maintenance of a fair and orderly market in such futures, and consistency of interpretation and practice. Without limiting the generality of the foregoing, the Clearing House may, if it deems such action appropriate for the protection of investors and the public interest, fix the final settlement price on the basis of the reported price of the underlying security or reported level of the underlying index at the close of regular trading hours (as determined by the Clearing House) on the last preceding trading day for which a closing stock price or index level was reported by the reporting authority.

2. The Clearing House may fix the final settlement price for affected futures using the opening prices of the relevant security or securities when the primary market(s) reopen. In that case, the date for making the final variation payment for the affected futures shall be postponed until the business day next following the day on which the final settlement price is fixed; and, in the case of physically-settled Security Futures Products, the delivery date shall also be postponed accordingly.

3. Every determination of the Clearing House pursuant to this Section shall be within the discretion of the Clearing House, in coordination with Partner Clearinghouses as appropriate, and shall be conclusive and binding on all investors and not subject to review. Unless the Clearing House directs otherwise, the price of an underlying security and the current index value of an underlying index as initially reported by the relevant Marketplace or other reporting authority shall be conclusively presumed to be accurate and shall be deemed final for the purpose of determining settlement prices and the final settlement price, even if such price or value is subsequently revised or determined to have been inaccurate.

INTERPRETATION TO 8B20. UNAVAILABILITY OR INACCURACY OF FINAL SETTLEMENT PRICE

The Clearing House will not adjust officially reported stock prices or current index values for final settlement purposes, even if those prices or values are subsequently found to have been erroneous, except in extraordinary circumstances. Such circumstances might be found to exist where, for example, the closing price or current index value as initially reported is clearly erroneous and inconsistent with prices or values reported earlier in the same trading day, and a corrected closing price or current index value is promptly announced by the reporting authority. In no event will a completed settlement be adjusted due to errors in officially reported stock prices or current index values.

8B21. DETERMINATION OF FINAL SETTLEMENT PRICE

The method for determining the final settlement price for a series of Security Futures Products shall be as specified in the rules of the Marketplace on which the contract is traded; provided, however, that in the event of any conflict between such Marketplace rules and the Rules of the CME, the Rules of the CME shall control. The final settlement price may be based upon the price or level of the underlying interest at the close of trading on the maturity date of a security future or at the opening of trading on the following business day. It may also be based upon an average of prices or levels during an appropriate period of time. Final settlement prices are subject to adjustment by the Clearing House in accordance with the Rules.

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INTERPRETATION TO 8B21. DETERMINATION OF FINAL SETTLEMENT PRICE

Notwithstanding the provisions of this Rule 8B21, no Marketplace may specify a method for determining a final settlement price that is inconsistent with applicable regulations of the Commodity Futures Trading Commission or Securities and Exchange Commission such as, for example, regulations requiring that the final settlement prices for certain security futures contracts must be based upon opening prices.

(End Chapter 8-B)

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Chapter 8C
Clearing Services

GENERAL

8C01. SCOPE OF CHAPTER

This chapter authorizes the Exchange to provide clearing services to another exchange or market. The procedures for the clearing, settlement and guarantee of trades executed on another exchange or market that are not specifically covered herein shall be governed by the Rules of the Exchange. Except as otherwise specifically provided herein, trade practice and sales practice rules and procedures, including, but not limited to, market regulation, market surveillance and customer protection rules and procedures, shall be governed by the rules of the other exchange or market at which the transaction takes place.

8C02. CONDITIONS TO CLEAR CONTRACTS

The Clearing House may clear transactions executed on or subject to the rules of another exchange or market in accordance with a clearing services agreement approved by the Board and subject to any necessary regulatory approvals of the clearing services agreement and the activities of such exchange or market.

8C03. TRANSFERS

The Clearing House may accept transfers of positions from another clearing house in order to perform clearing services for another exchange or Market. Such transfers shall be made in accordance with the Rules and operating procedures of the Exchange. Such transfers must be made at the daily settlement value per Rule 813.F.

8C04. FUTURES LISTED FOR TRADING ON A FOREIGN BOARD OF TRADE

Without limiting the generality of Rule 8C01, the Clearing House may provide clearing services to a foreign board of trade with respect to transactions in futures or options on futures traded on or subject to the rules of such FBOT. The Clearing House, in relation to providing such clearing services, will provide reports and such other information to the FBOT as may be required for the business operations and regulatory requirements applicable to the FBOT.

The Clearing House will clear customer positions in the FBOT's contracts for an FCM Clearing Member in a manner consistent with CFTC Regulation 30.7 or, subject to CFTC approval and any regulatory approval required in the FBOT's local jurisdiction, in a futures segregated account held in accordance with section 4d(a) of the CEA and CFTC regulations thereunder or in a cleared swaps customer account held in accordance with the CFTC Part 22 Regulations.

The Clearing House may require a person to be authorized as a clearing member for CME, CBOT, NYMEX or COMEX contracts as a condition to be authorized to clear transactions in the contracts of a particular FBOT.

The Clearing House provides clearing services pursuant to this Rule 8C04 to the Gulf Mercantile Exchange. CME may terminate clearing services for FBOTs subject to applicable terms.

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Chapter 8-F
Over-the-Counter Derivative Clearing

8F001. SCOPE OF CHAPTER

This chapter sets forth the rules governing clearing and settlement of all products, instruments, and contracts in Over-The-Counter Derivatives, including, but not limited to, swaps and forward rate agreements, that the Clearing House has designated as eligible for clearing, but excluding interest rate swaps, which, for the avoidance of doubt, are governed by Chapter 8G. OTC Clearing Members are also subject to all applicable Rules in the CME, CBOT, NYMEX and/or COMEX Rulebooks that apply to CME, CBOT, NYMEX or COMEX Clearing Members as applicable, unless an exemption from such rule has been granted by staff or the Clearing House Risk Committee. In the event there is a conflict between a rule in this Chapter 8-F and another rule in the Rulebooks, the Chapter 8-F Rule shall supersede the conflicting rule with respect to OTC Derivatives transactions.

8F002. DEFINITIONS

BASE OTC CLEARING MEMBER

A Base OTC Clearing Member is an entity that has been approved by CME to clear OTC Derivatives that are Base Guaranty Fund Products.

OTC FX CLEARING MEMBER

An OTC FX Clearing Member is a Clearing Member that has been approved by CME to clear OTC FX Products, as defined in CME Rule 60002. Unless an OTC FX Clearing Member is also approved to clear other Base Guaranty Fund Products, such entity is not required to own, hold or lease any Exchange membership solely as a precondition to OTC FX Clearing Membership. Notwithstanding the foregoing, an OTC FX Clearing Member that does not hold or lease one or more Exchange memberships shall continue to be responsible for violations of Exchange Rules as a Base OTC Clearing Member and agrees to have any disputes that relate to or arise out of any transaction cleared by the Exchange during the time in which the entity is approved as a Base OTC Clearing Member resolved in accordance with Exchange Rules, including but not limited to the arbitration provisions of Chapter 6. For avoidance of doubt, each OTC FX Clearing Member is a 'member' as defined at Rule 601.A.4, a Base OTC Clearing Member and an OTC Clearing Member.

OTC CLEARING MEMBER

An OTC Clearing Member is an entity that has been approved by CME to clear OTC Derivatives. An OTC Clearing Member that is not also a CME, CBOT, NYMEX or COMEX Clearing Member may not clear CME, CBOT, NYMEX or COMEX transactions, as applicable, other than OTC Derivatives.

Subject to approval by CME Clearing (for addition of OTC Derivatives products for existing CME, CBOT, NYMEX and COMEX Clearing Members) or the Clearing House Oversight Committee pursuant to Rules 403 and 912, CME, CBOT, NYMEX and COMEX Clearing Members may be afforded full rights and privileges to trade and clear OTC Derivatives that are listed for clearing by CME, CBOT, NYMEX or COMEX, as applicable. Such CME, CBOT, NYMEX and COMEX Clearing Members shall then be considered "OTC Clearing Members," as applicable, for purposes of the Rules. This chapter shall be applicable to entities that are approved as "OTC Clearing Members" and CME, CBOT, NYMEX and COMEX Clearing Members approved to clear OTC Derivatives.

OTC DERIVATIVES

Agreements, contracts or transactions that the Clearing House clears as 'swaps', as that term is defined under the Commodity Exchange Act. For purposes of this Chapter 8-F, the term 'OTC Derivatives' does not include interest rate swaps cleared by the Clearing House.

OTC DERIVATIVE PRODUCT CATEGORY

Each category and sub-category of OTC Derivatives as determined by the Clearing House for mandatory Base OTC Clearing Member participation in default management processes.

CLOSE-OUT AMOUNT

The amount of losses and costs of the CME that are or would be incurred by the CME, net of any gains incurred in replacing, or in providing the CME the economic equivalent of the material terms of the terminated OTC Derivatives, net of any gains incurred (if such net amount is positive), including (a) the payments and deliveries that would, absent termination, have been required after the termination date, (b) any option rights in respect of the terminated transactions, (c) all unpaid amounts due to the CME

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under the terminated transaction with the relevant Clearing Member less all unpaid amounts due to such Clearing Member under the terminated transactions and (d) all related fees, costs and expenses incurred by the CME.

8F003. CLASSIFICATION OF POSITIONS

OTC Derivatives submitted for clearing by an OTC Clearing Member for its proprietary account shall be assigned to and held in a proprietary account of such Clearing Member. All collateral deposited as performance bond to support positions in the proprietary account of an OTC Clearing Member shall be deemed the property of the OTC Clearing Member and shall be subject to the Clearing House's lien and security rights as described in Rule 8F008.

OTC Derivatives submitted for clearing for the account of a Clearing Member's Cleared Swaps Customers shall be assigned and held in a Cleared Swaps Customer Account of such Clearing Member. All Clearing Members must comply with the requirements set forth in CME Rule 971 for such Cleared Swaps Customer Accounts.

Notwithstanding the foregoing, if the CFTC issues an order or otherwise approves permitting OTC Clearing Members to commingle customer funds used to margin particular OTC Derivatives that are cleared by CME with other funds held in CEA Section 4d(a)(2) customer segregated accounts, such positions may be held in the customer segregated accounts of an OTC Clearing Member and, if so held, all collateral deposited as performance bond to support such positions and all settlement variation payments made to such accounts shall be commingled with similar property of regulated customers. All Clearing Members must comply with the requirements set forth in CME Rule 971 for such customer segregated accounts.

8F004. OTC CLEARING MEMBER OBLIGATIONS AND QUALIFICATIONS

OTC Clearing Members are subject to all relevant CME, CBOT, NYMEX and COMEX Rules and the Clearing House Manual unless an exemption has been granted by staff or the Clearing House Oversight Committee. OTC Clearing Members must execute all agreements and documents required by the Clearing House. The qualifications and requirements to become an OTC Clearing Member are set forth below.

An OTC Clearing Member clearing OTC Derivatives must satisfy the requirements set forth below.

1. An OTC Clearing Member must be in "good standing" under each applicable regulatory regime to which it is subject at the time it applies for OTC clearing membership and it must maintain its good standing status while it is an OTC Clearing Member.

2. An OTC Clearing Member must be in compliance with all applicable regulatory capital requirements and an OTC Clearing Member must maintain minimum capital of:

   i. $5 million if it clears only commodity and/or event swap OTC Derivatives; and

   ii. $50 million if it clears other OTC Derivatives

3. [Reserved]
4. [Reserved]
5. [Reserved]

6. An OTC Clearing Member and an OTC Clearing Member applicant shall be engaged in or demonstrate immediate capacity to engage in the conduct of the business of an OTC Clearing Member and to perform all other obligations of an OTC Clearing Member as described or referenced in these Rules, including the ability to properly risk manage OTC Derivatives, monitor OTC Derivatives exposures and comply with default management obligations. In the event that an OTC Clearing Member does not have the capabilities to perform such responsibilities or obligations, such OTC Clearing Member may contract with a third-party (including an Affiliate) to fulfill certain operational or risk requirements; provided that all agreements relating to such service shall be subject to the prior review and approval by the Clearing House staff and consultation with the Clearing House Risk Committee, as appropriate. The Clearing House may impose limitations on OTC Clearing Member utilization of service providers, including limitations on the number of OTC Clearing Members to which a service provider may provide services. Notwithstanding the above, each OTC Clearing member remains liable to the Clearing House for failure to comply with the obligations of an OTC Clearing Member.

7. [Reserved]

8. An OTC Clearing Member must comply with the financial requirements set forth in CME Rule 970. However, if the OTC Clearing Member is regulated by another regulatory authority, then it shall submit

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to CME annual audited financial statements as well as all unaudited financial statements provided to its primary regulator within five days after such statements are provided to its regulator. All financial statements shall be in the English language.

9. The books and records of an OTC Clearing Member regarding OTC Derivatives cleared by the Clearing House shall be made promptly available for inspection upon request by CME and such books and records shall be subject to reasonable standards of confidentiality.

10. Each OTC Clearing Member that is a Futures Commission Merchant shall keep the types of information and records that are described in Section 4g of the Commodity Exchange Act and CFTC regulations thereunder including, but not limited to, Regulation 1.35, with respect to all OTC Derivatives submitted for clearing.

11. Each Base OTC Clearing Member shall make at least two traders (one primary and one backup) per OTC Derivative Product Category available to the Clearing House to participate in the Active Base OTC Default Management Committee immediately upon notice from the Clearing House that it is convening the Active Base OTC Default Management Committee for (i) a potential or actual default of a Base OTC Clearing Member and (ii) for OTC Derivative default drill exercises.

Upon acceptance as a Base OTC Clearing Member and upon any update request by Clearing House, each Base OTC Clearing Member shall provide a list of traders that the Base OTC Clearing Member nominates for the Active Base OTC Default Management Committee. Any such trader shall have a title at the level of Vice President (or equivalent title) and/or shall have the minimum level of experience the Clearing House deems necessary for the relevant OTC Derivatives. Each Base OTC Clearing Member shall make at least one trader per each OTC Derivative Product Category available to the Clearing House to participate in the Active Base OTC Default Management Committee immediately upon notice from the Clearing House that it is convening the Active Base OTC Default Management Committee for (i) a potential or actual default of an OTC Clearing Member or (ii) for OTC default drill exercises. Base OTC Clearing Members shall make traders available for each OTC Derivative Product Category as requested by the Clearing House until the later of (i) the end of the relevant default management process or drill or (ii) the end of such traders' rotation.

12. Each OTC Clearing Member or a third-party approved to act on its behalf shall participate in OTC Derivative default drill exercises as prescribed by the Clearing House.

8F005. SUBSTITUTION AND TIMEFRAME OF ACCEPTANCE FOR CLEARING

An OTC Derivative that is both executed and submitted to the Clearing House on the current business date at prevailing market prices, and in accordance with the rules governing such transaction shall be guaranteed by the Clearing House once accepted at the Clearing House. An existing OTC Derivative (i.e., a backloaded trade) that is submitted to the Clearing House for clearing, shall be guaranteed by the Clearing House at the time payment of initial settlement of mark to market, performance bond and any other applicable initial OTC cash flows for such OTC Derivative, in accordance with the procedures set forth in Rule 814, is confirmed by the appropriate settlement bank for both OTC Clearing Members. The Clearing House shall substitute itself as the counterparty to each party to the original transaction at the time of guarantee.

With regard to an OTC Derivative submitted for clearing that is executed on or subject to the rules of a Designated Contract Market or a Swap Execution Facility, the Clearing House shall accept or reject such OTC Derivative for clearing in accordance with the time frames required under CFTC Regulation 39.12(b)(7)(B)(ii). Except with respect to a backloaded trade, an OTC Derivative submitted for clearing that is not executed on or subject to the rules of a Designated Contract Market or a Swap Execution Facility, or that is executed noncompetitively on or subject to the rules of a Designated Contract Market or a Swap Execution Facility, shall be accepted or rejected for clearing in accordance with the time frames required under CFTC Regulation 39.12(b)(7)(B)(iii).

The OTC Clearing Member shall be deemed the principal to the transaction when executed by that Clearing Member for its own proprietary account, as a guarantor agent to the transaction when executed by that Clearing Member for the account of a proprietary affiliate, or the agent when executed by the clearing member for the account of an authorized customer of that Clearing Member. After that substitution, there shall be two equal and offsetting over-the-counter transactions as follows: one between the buyer and the Clearing House, as seller; and an equal and offsetting transaction between the Clearing House and the seller.

8F006. CLEARING MEMBER DEFAULT

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If an OTC Clearing Member fails promptly to discharge any obligation to the Clearing House, it shall be in default and the Clearing House may take all actions permitted by these Rules in the event of a default. All of the assets and collateral of an OTC Clearing Member that are available to CME including, but not limited to, its guaranty fund deposit and performance bond shall be applied by the Clearing House to discharge the obligation. The Clearing House may engage in any commercially reasonable transaction or action contemplated by the Rules and the Base Default Management Guidelines to manage, eliminate or reduce the risk created by the default, including but not limited to, entering into hedges, liquidating positions in the market, auctioning or selling a portion or all of the portfolio of the defaulting firm and, if applicable, its customers. and combining or offsetting by book-entry positions in eligible accounts of one or more defaulters. All obligations, costs and expenses incurred by entering into any transactions contemplated under the Rules shall be an obligation of the defaulting OTC Clearing Member to the Clearing House. If the defaulting clearing member has proprietary or customer positions in contracts traded on an execution platform with which CME has a clearing services agreement, the Clearing House, acting in good faith and a commercially reasonable manner, will determine the appropriate default management approach, which may include but is not limited to the determination to close out and cash settle all open positions in contracts executed on such execution platform.

8F007. GUARANTY FUND DEPOSIT

An OTC Clearing Members' guaranty fund deposit may be used to cover losses incurred by the Clearing House if a defaulting OTC Clearing Member's assets, including amounts available pursuant to any guarantee from an affiliated Clearing Member, available to the Clearing House are insufficient to cover such loss, regardless of the cause of default.

The detailed guaranty fund deposit rules applicable to Clearing Members are set forth in Rule 816.

8F008. LIEN ON COLLATERAL

Each OTC Clearing Member hereby grants to the Clearing House to secure obligations of such OTC Clearing Member to the Clearing House a first priority and unencumbered security interest and lien against any property, cash, securities or collateral deposited with, transferred or pledged to, or otherwise where control is given to the Clearing House by the OTC Clearing Member. OTC Clearing Members shall take any action that may be required by the Clearing House to create, preserve, perfect, validate or enforce any such security interest.

8F009. CUSTOMER REGISTRATION

All OTC Derivatives including, but not limited to, give-ups or transfers that are cleared at CME shall be identified with an account number which identifies the originator of that transaction, specifying whether the transaction was executed as a proprietary transaction of the OTC Clearing Member or arises from a transaction by a customer. OTC Clearing Members shall register, on CME approved forms, all of the "ultimate" (or end) customer.

8F010. RISK MANAGEMENT

OTC Clearing Members will be subject to risk management and monitoring practices by CME relating to transactions submitted to the Clearing House. OTC Clearing Members shall promptly provide all information requested by Clearing House staff, including, without limitation, information respecting risk, settlement, liquidity, and operational issues. OTC Clearing Members shall make information and documents regarding their risk management policies, procedures and practices available to the CFTC upon the CFTC's request.

In limited circumstances, the Clearing House may decline to accept certain OTC Derivatives trades or migration positions if the Clearing House determines in good faith that, based on the exercise of prudent risk management standards, the Clearing House should not accept the OTC Derivatives trades or migration positions. In the event that the Clearing House declines to accept certain OTC Derivative trades or migration positions, it shall incur no liability with respect to the trades and positions that are not accepted. It shall be the sole responsibility of the OTC Clearing Members who are parties to such trades or positions to take action as they deem necessary or proper for their own protection.

In addition, if the Clearing House determines in good faith that, based on the exercise of prudent risk management standards, that an OTC Clearing Member poses undue risk to the Clearing House based on its OTC Derivatives portfolio, the Clearing House may take any or all of the following actions with respect to such OTC Clearing Member: 1) impose an additional performance bond requirement; 2) prohibit the addition of any new OTC Derivative positions, or 3) require the reduction or unwinding of

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OTC Derivatives positions.

OTC Clearing Members shall permit on-site risk reviews in accordance with CME Rules and subject to reasonable standards of confidentiality. OTC Clearing Members will also be subject to on-going oversight by the Clearing House Risk Committee and the Clearing House Oversight Committee regarding their activities related to the CME Clearing House. All such inquiries shall be conducted in a manner consistent with oversight of CME Clearing Members and in accordance with reasonable standards of confidentiality.

8F011. FINANCIAL REQUIREMENTS

A. Subject to exceptions granted by CME staff regarding CME imposed financial requirements, OTC Clearing Members must comply with the following:
   1. Maintenance of minimum capital requirements;
   2. Notification requirements to the Financial and Regulatory Surveillance Department when a clearing member:
      (i) Fails to maintain minimum capital requirements;
      (ii) Fails to maintain current books and records; or
      (iii) Changes its fiscal year.

B. CME staff may prescribe additional accounting, reporting, and other financial and/or operational requirements and OTC Clearing Members must comply with such requirements. All OTC Clearing Members must provide immediate notice to the Financial and Regulatory Surveillance Department of a failure to comply with the additional accounting, reporting, financial, and/or operational requirements.

C. CME staff may grant exceptions to the financial requirements of Rule 970 if it is determined that such exceptions will not jeopardize the financial integrity of CME.

8F012. SETTLEMENT

An OTC Clearing Member must demonstrate, at all times, the operational capabilities and infrastructure necessary to meet all of the delivery requirements applicable to the OTC Derivatives cleared by such OTC Clearing Member.

8F013. INSOLVENCY AND LIQUIDATION

In the event of a bankruptcy, insolvency or liquidation of an OTC Clearing Member or any other clearing member carrying OTC Derivatives in its proprietary or customer accounts, the default Rules and risk management procedures of CME shall apply, including, but not limited to, the provisions in Rule 975. Upon the bankruptcy, insolvency or liquidation of such a clearing member, the Clearing House will terminate, or offset, any open OTC Derivatives of the bankrupt or insolvent Clearing Member and of its customers, however, the Clearing House shall have discretion to transfer such customer positions to one or more other Clearing Members. The Clearing House may mitigate or eliminate the risks incurred by it as a result of offsetting or terminating such open OTC Derivatives by any one or more of the following means: 1) replace all or a portion of the OTC Derivatives of the defaulting clearing member by entering into a transaction with a solvent clearing member(s); 2) replace all or a portion of the OTC Derivatives of the defaulting clearing member by entering into OTC Derivatives for its own account in the open market; and/or 3) enter into OTC Derivatives (or exchange-traded contracts) to hedge the economic risks imposed on it as a result of offsetting or terminating such OTC Derivatives by any commercially reasonable means. The Clearing House may also replace any OTC Derivatives it enters into to replace or hedge economic risks from any terminated transaction by substituting a transaction with a solvent clearing member(s) that offsets the original terminated transaction. All information received by an OTC Clearing Member, its affiliate or customer in connection with the Clearing House's liquidation and default management processes shall be treated as confidential.

Any Close-out Amount incurred by the Clearing House in liquidating, transferring and establishing, adjusting and/or replacing positions resulting from the clearing member's default will be deducted from the defaulting clearing member's collateral held by CME. In the event the collateral of the defaulting clearing member is not sufficient to satisfy the Close-Out Amount, the unsatisfied costs will be a claim by the Clearing House against the defaulting clearing member.

8F014. MITIGATION OF LOSSES

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In the event of a default of a Base OTC Clearing Member, all Base OTC Clearing Members shall work cooperatively with their customers, other Base OTC Clearing Members and the Clearing House to mitigate any losses that may occur as a result of such default and shall ensure that human resources required to be provided by Base OTC Clearing Members to any Active Base OTC Default Management Committee are promptly made available.

Bidding OTC Firms shall: 1) provide commercially reasonable bids in all auctions of the defaulted Base OTC Clearing Member's portfolio containing OTC Derivative Product Category cleared by the Base OTC Clearing Member and on the auction terms prescribed by the Clearing House; and 2) take any other action as reasonably requested by the Emergency Financial Committee or Clearing House Risk Committee.

The Base Guaranty Fund contribution of each Participating Base OTC Clearing Member shall be applied in accordance with CME Group Exchange Rule 802.B.

8F015. TRADE SUBMISSION ON CME CLEARPORT

A. This rule governs all OTC Derivatives that the Clearing House has designated as eligible for clearing that are submitted for clearing via CME ClearPort and that are not extinguished and replaced by positions in regulated futures and options ("Transactions"). The parties to a Transaction and any person authorized under Section C of this Rule with brokering capability or trade submission authority (generically defined as "Broker" or "Brokers") must comply with applicable registration procedures for participation in CME ClearPort and must continue to comply with applicable registration procedures for OTC Derivatives, as may be amended from time to time. Transactions are also subject to the other rules in this chapter.

B. Each Transaction must be submitted in accordance with the procedures established by the Clearing House for this purpose, as amended from time to time. The parties to a Transaction and any Brokers authorized to submit Transactions on such a party's behalf to the Clearing House and authorized for related activities shall be exclusively responsible, both individually and jointly, for accurately confirming the details of the Transaction to the Clearing House. Once submitted, all Transactions shall be deemed final. Neither the Clearing House nor a Clearing Member carrying the account of either party will have any responsibility in the confirmation of trade terms for Transactions.

C. Each Clearing Member must register with the Clearing House staff in the manner required for any customer authorized by the Clearing Member to submit transactions to the Clearing House pursuant to this rule, and must also register with the Clearing House staff the applicable account numbers for each such customer. For each such account, the Clearing Member carrying that account also must submit to Clearing House staff in the manner provided the name of any Broker who has registered with Clearing House staff for services provided under this rule, and who is authorized by the customer to act on its behalf in the submission of Transactions pursuant to this rule and related activity. For any such Brokers authorized by the customer and submitted to Clearing House staff by the Clearing Member, such submission to Clearing House staff of the Broker's information by the Clearing Member will not constitute an endorsement or ratification of the customer's authorization of the Broker. Moreover, submission of a Broker authorized by a customer will not mean that the Clearing Member is in privity with, has a relationship with or is otherwise standing behind any of the customer's authorized Brokers, and the Clearing Member will have no responsibility for any such Brokers selected by the customer and no duty or obligation to supervise the activities of any such Brokers.

D. For each account number that has been registered with the Clearing House staff pursuant to Section C of this rule, a credit check or explicit clearing member acceptance or rejection of a transaction must occur depending on the transaction type.

8F016. FINANCIAL CALCULATIONS

Financial calculations required for OTC Derivatives will be performed by CME Clearing on the date such OTC Derivatives are cleared in the Clearing House in accordance with CME Clearing's procedures. Financial calculations for OTC Derivatives that are received and processed after the daily clearing cycle will be performed on the next Business Day.

8F018. OTC FX OPTIONS INFORMATION SUBMISSIONS

1. Each OTC FX Options Clearing Member or a third-party approved to act on its behalf shall submit the OTC FX Options Information Submission File on each Business Day at the time specified by the Clearing House for all FX Options required by the Clearing House. The information submitted by

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an OTC FX Clearing Member in the OTC FX Options Information Submission File shall be consistent with the information used by the OTC FX Options Clearing Member for its internal valuation of OTC FX Options.

2. During a calendar month that is not during a Base Cooling Off Period, an OTC FX Options Clearing Member will be assessed a penalty per Failed OTC FX Options Submission based on the following table:

# of Failed OTC FX Options Submissions for that month	Penalty per Failed OTC FX Options Submission
1	0
2	$5,000
3	$25,000
4+	$50,000

During a Base Cooling Off Period, an OTC FX Options Clearing Member will be assessed a penalty per Failed OTC FX Options Submission based on the following table:

# of Failed OTC FX Options Submissions for that month	Penalty per Failed OTC FX Options Submission
1	0
2	$15,000
3	$75,000
4+	$150,000

Penalties shall be assessed monthly and payable with the Base Guaranty Fund payment cycle. In addition, the OTC FX Options Clearing Member may be referred to the Chief Regulatory Officer for potential issuance of charges and further disciplinary action in accordance with Chapter 4 of this Rulebook.

1. As used herein:

"Failed OTC FX Options Submission" means a failure to submit (i) all or a portion of an OTC FX Options Information Submission File at or prior to the time designated by the Clearing House or (ii) the OTC FX Options Information Submission File in the proper format.

"OTC FX Options Clearing Member" means an OTC FX Clearing Member clearing OTC FX Options.

"OTC FX Options Information Submission File" means the file containing the requested market data, internal price levels and such other information as specified by the Clearing House for each moneyness/expiry/currency pair combination.

8F025. ACTIVE BASE OTC DEFAULT MANAGEMENT COMMITTEE

The Active Base OTC Default Management Committee may be established to provide the Clearing House with advice regarding the potential or actual default of a Base OTC Clearing Member and the management of the liquidation and/or transfer of such Base OTC Clearing Member's portfolio of OTC Derivatives, including advice relating to the hedging of risk associated with such Base OTC Clearing Member's portfolio, the structuring of such Base OTC Clearing Member's portfolio for liquidation or transfer, and the administration of the related default auction process. The Active Base OTC Default Management Committee shall also participate in OTC Derivative default drill exercises, as required by the Clearing House.

The Active Base OTC Default Management Committee will be comprised of traders (on a rotating basis determined by the Clearing House) that are nominated by Base OTC Clearing Members in accordance

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with Rule 8F004 and approved by the Clearing House.

In the event of a potential or actual default of a Base OTC Clearing Member, the Active Base OTC Default Management Committee may be convened and the Clearing House will undertake a series of processes to protect itself and its counterparties (such plans, as amended from time to time in consultation with the Clearing House Risk Committee, include the "Base Default Management Guidelines").

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Chapter 8-G
Interest Rate Derivative Clearing

8G01. SCOPE OF CHAPTER

This chapter sets forth the rules governing clearing and settlement of all IRS Products. In the event there is a conflict between a rule in this Chapter 8G and another rule in the Rulebooks, the Rule in this Chapter 8G shall supersede the conflicting rule with respect to IRS Contracts. Rulebook Chapter 8-F and Rules 802, 813, 816, 913, 930 and 975 shall not apply to IRS Contracts, except for Rule 818 which shall supersede the rules in this chapter 8G. Chapter 6 shall be modified for IRS Contracts as set forth below.

8G02. DEFINITIONS

ACTIVE IRS DEFAULT MANAGEMENT COMMITTEE

The Active IRS Default Management Committee shall be a committee having the powers set forth in Rule 8G25.

AFFILIATE

With respect to an IRS Clearing Member, any person or entity is an Affiliate of such IRS Clearing Member if such person or entity directly or indirectly, through one or more intermediaries, controls, owns, is controlled by or is under common control with such IRS Clearing Member.

IRS ADVISORY COMMITTEE

The IRS Advisory Committee shall be a committee having the powers set forth in Rule 8G26.

IRS EMERGENCY FINANCIAL COMMITTEE

The IRS Emergency Financial Committee shall be a committee having the powers set forth in Rule 8G975.

IRS PRODUCT CATEGORY

Each category and sub-category of IRS as determined by the Clearing House for default management purposes.

IRS RISK COMMITTEE

The IRS Risk Committee shall be a committee having the powers set forth in Rule 8G27.

8G03. CLASSIFICATION OF POSITIONS

IRS Contracts submitted for clearing by an IRS Clearing Member for its proprietary account shall be assigned to and held in a proprietary account of such IRS Clearing Member. All collateral deposited as performance bond to support positions in the proprietary account of an IRS Clearing Member shall be deemed the property of the IRS Clearing Member and shall be subject to the Exchange's lien and security rights as described in Rule 8G08.

IRS Contracts submitted for clearing for the account of an IRS Clearing Member's Cleared Swaps Customers shall be assigned and held in a Cleared Swaps Customer Account of such IRS Clearing Member. All IRS Clearing Members must comply with the requirements set forth in CME Rule 971 for such Cleared Swaps Customer Accounts.

Notwithstanding the foregoing, if the CFTC issues an order permitting IRS Clearing Members to commingle customer funds used to margin particular IRS Contracts that are cleared by the Clearing House with other funds held in CEA Section 4d(a)(2) customer segregated accounts, such positions may be held in the customer segregated accounts of an IRS Clearing Member and, if so held, all collateral deposited as performance bond to support such positions and all settlement variation payments made to such accounts shall be commingled with similar property of regulated customers. All IRS Clearing Members must comply with the requirements set forth in CME Rule 971 for such customer segregated accounts.

8G04. IRS CLEARING MEMBER OBLIGATIONS AND QUALIFICATIONS

IRS Clearing Members shall be subject to the requirements for IRS Clearing Members set forth in Chapter 8G, all CME Rules applicable to IRS Products, and the Clearing House Manual of Operations unless an exemption has been granted by the Clearing House Risk Committee or the IRS Risk Committee, as applicable. In addition, IRS Clearing Members are subject to all CME, CBOT and NYMEX Rules, as applicable, when clearing products traded on, or subject to the rules

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of, CME, CBOT or NYMEX. IRS Clearing Members must execute all agreements and documents required by the Clearing House.

An IRS Clearing Member must satisfy the requirements set forth below:

1. An IRS Clearing Member must be in compliance with all applicable regulatory capital requirements and it must maintain minimum capital (as defined in CFTC Regulation 39.12(a) (2)) of $50 million. For an IRS Clearing Member that is a bank, "capital" shall mean Tier 1 Capital (as defined in accordance with regulation applicable to the relevant bank and acceptable to the Clearing House or, in the absence of any such regulation, as defined by the Basel Committee on Banking Supervision of the Bank for International Settlements).

2. The capital requirement with respect to the participation of an IRS Clearing Member in the Clearing House shall be scalable to the risks posed by such IRS Clearing Member. Accordingly, an IRS Clearing Member must maintain capital (as defined in 8G04.1 above) at least equal to 20% of the aggregate performance bond requirement for its proprietary and customer IRS Contracts.

3. An IRS Clearing Member and any applicant for IRS clearing membership shall be engaged in or demonstrate immediate capacity to engage in the conduct of the business of a IRS Clearing Member and to perform all other obligations of a IRS Clearing Member as described or referenced in these Rules, including the ability to properly risk manage IRS Products, monitor IRS Product exposures and comply with default management obligations. In the event that a IRS Clearing Member does not have the capabilities to perform such responsibilities or obligations, such IRS Clearing Member may contract with a third party (including an Affiliate) to fulfill certain operational or risk requirements; provided that all agreements relating to such service shall be subject to the prior review and approval by the Clearing House staff and consultation with the IRS Risk Committee. The Clearing House may impose limitations on IRS Clearing Member utilization of service providers, including limitations on the number of IRS Clearing Members to which a service provider may provide services. Notwithstanding the above, each IRS Clearing Member remains liable to the Clearing House for failure to comply with the obligations of an IRS Clearing Member.

4. Upon Clearing House request, each IRS Clearing Member shall submit nominations for an Independent Member of the IRS Risk Committee.

5. When required by the rotation established by the Clearing House, each IRS Clearing Member shall make at least one trader per IRS Product Category available to the Clearing House to participate in the Active IRS Default Management Committee immediately upon notice from the Clearing House that it is convening the Active IRS Default Management Committee for (i) a potential or actual default of an IRS Clearing Member or (ii) for IRS default drill exercises.

Upon acceptance as an IRS Clearing Member and upon any update request by the Clearing House, each IRS Clearing Member shall provide a list of traders (at least one primary and one backup per IRS Product Category) that the IRS Clearing Member nominates for the Active IRS Default Management Committee. Any such trader shall have a title at the level of Vice President (or equivalent title) or above and/or shall have the minimum level of experience the Clearing House deems necessary for the relevant IRS Product Category. IRS Clearing Members shall make traders available for each IRS Product Category as requested by the Clearing House until the later of (i) the end of the relevant default management process or drill or (ii) the end of such traders' rotation.

6. Each IRS Clearing Member shall bid in each hedging or liquidation auction conducted by the Clearing House for part or all of a defaulted IRS Clearing Member's IRS Contracts (each a "Default Management Auction"), as required by the Clearing House. Each IRS Clearing Member shall participate in IRS default drill exercises as prescribed by the Clearing House. Each IRS Clearing Member shall have the ability to provide quotations to CME for hedging transactions for the IRS portfolio of a defaulted IRS Clearing Member.

7. Each IRS Clearing Member shall participate in each IRS Liquidity Poll ("Poll") for each IRS Product currency in which the IRS Clearing Member has open interest, unless exempted by the Clearing House for that currency. A Clearing Member's failure to provide required Poll submissions by the deadline established by the Clearing House may result in the IRS Clearing Member being assessed up to $50,000 and/or referred to the Chief Regulatory Officer for potential disciplinary action, in accordance with established CME Clearing procedures.

8. Each IRS Clearing Member shall use systems and appropriate procedures to track accurately, and to provide to the Clearing House accurately, the IRS positions and collateral of each of its cleared swaps customers.

9. An IRS Clearing Member must comply with the financial requirements set forth in CME Rule

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970. However, if the IRS Clearing Member is regulated by another regulatory authority, then it shall submit to CME annual audited financial statements as well as all unaudited financial statements provided to its primary regulator within five days after such statements are provided to its regulator. All financial statements shall be in the English language.

10. The books and records of an IRS Clearing Member regarding IRS Contracts cleared by the Clearing House shall be made promptly available for inspection upon request by CME and such books and records shall be subject to reasonable standards of confidentiality.

11. Each IRS Clearing Member that is a Futures Commission Merchant shall keep the types of information and records that are described in Section 4g of the Commodity Exchange Act and CFTC regulations thereunder including, but not limited to, Regulation 1.35, with respect to all IRS Contracts submitted for clearing.

8G05. SUBSTITUTION AND TIMEFRAME OF ACCEPTANCE FOR CLEARING

If an IRS Product or a portfolio of IRS Products (i) is submitted by IRS Clearing Members who are in good standing, (ii) was executed and submitted in accordance with the rules governing such IRS Product and (iii) does not exceed the credit limits established by the Clearing House for the IRS Clearing Member submitting such IRS Product or portfolio of IRS Products, then the Clearing House shall substitute itself as the counterparty to each party of each original transaction and there shall be two equal and offsetting contracts for each original transaction as follows: one between the original buyer and the Clearing House, as seller and one between the original seller and the Clearing House, as buyer.

An existing IRS Product or portfolio of IRS Products (i.e., a backloaded trade) submitted to the Clearing House for clearing, shall be guaranteed by the Clearing House at the time payment of initial settlement of mark to market, performance bond and any other applicable initial OTC cash flows for such IRS Product or portfolio of IRS Products, in accordance with the procedures set forth in Rule 814, is confirmed by the appropriate settlement bank for both IRS Clearing Members. The Clearing House shall substitute itself as the counterparty to each party to the original transaction at the time of guarantee.

With regard to an IRS Product submitted for clearing that is executed on or subject to the rules of a Designated Contract Market or a Swap Execution Facility, the Clearing House shall accept or reject such OTC Derivative for clearing in accordance with the time frames required under CFTC Regulation 39.12(b)(7)(B)(ii). Except with respect to a backloaded trade, an IRS Product submitted for clearing that is not executed on or subject to the rules of a Designated Contract Market or a Swap Execution Facility, or that is executed noncompetitively on or subject to the rules of a Designated Contract Market or a Swap Execution Facility, shall be accepted or rejected for clearing in accordance with the time frames required under CFTC Regulation 39.12(b)(7)(B)(iii).The IRS Clearing Member shall be deemed the principal to the IRS Contract when cleared by such IRS Clearing Member for its own proprietary account and shall be deemed a guarantor and agent of the IRS Contract when cleared by such IRS Clearing Member for the account of an affiliate or customer of such IRS Clearing Member.

8G06. [RESERVED]

8G07. IRS FINANCIAL SAFEGUARDS AND GUARANTY FUND DEPOSIT

1. (i) The Clearing House shall establish a financial safeguards package to support IRS clearing, and each IRS Clearing Member shall make an IRS Guaranty Fund deposit with the Clearing House. An IRS Clearing Member's deposit to the IRS Guaranty Fund and assessments against it pursuant to these Rules may be used to cover losses incurred by the Clearing House if a defaulted IRS Clearing Member's assets, including amounts available pursuant to any guarantee from an Affiliate of an IRS Clearing Member, available to the Clearing House are insufficient to cover such loss, regardless of the cause of default. The Clearing House shall calculate the requirements for the IRS financial safeguards package, which shall be composed of:

    (a) a funded portion, determined by the Clearing House using stress test methodology equal to the theoretical two largest IRS Clearing Member losses produced by such stress test or such other methodology determined by the IRS Risk Committee (such amount, the "IRS Guaranty Fund"), where the risk of each IRS Clearing Member and its Affiliate(s) are taken into account in calculations sizing the IRS Guaranty Fund; and

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(b) an unfunded portion, determined by the Clearing House using stress test methodology equal to the theoretical third and fourth largest IRS Clearing Member losses produced by such stress test (and assuming for purposes of the model that already-defaulted IRS Clearing Members will fail to contribute) or such other methodology determined by the IRS Risk Committee. Upon a default, after application of the IRS Guaranty Fund, each IRS Clearing Member (excluding any insolvent or defaulted IRS Clearing Member) shall be subject to assessment of its previously-assigned proportionate share of such amount (collectively the "IRS Assessments").

(ii) Each IRS Clearing Member's minimum contribution to the IRS Guaranty Fund shall be the greater of:

(a) such IRS Clearing Member's proportionate share of the IRS Guaranty Fund based on the 30-day trailing average of its potential residual loss ("PRL") and the 30-day trailing average gross notional open interest outstanding at the Clearing House (or in either case, such other shorter time interval determined by the IRS Risk Committee); or

(b) $15,000,000.

(iii) Notwithstanding CME Rule 8G802.H, any IRS Clearing Member whose trader fails to attend during an Active IRS Default Management Committee related to a potential or actual default will have its IRS Guaranty Fund contribution requirement increased by the Specified Attendance Failure Amount for the 12-month period commencing the date upon which the trader was originally expected to attend the Active IRS Default Management Committee. Such increased amount will be available to be used pursuant to CME Rule 8G802 for any IRS Losses occurring during such 12-month period (including any IRS Losses related to the default for which the relevant Active IRS Default Management Committee was convened). In addition, the IRS Clearing Member may be referred to the Chief Regulatory Officer for potential issuance of charges and further disciplinary action in accordance with Chapter 4 of this Rulebook. Clearing House staff may grant an exception to the increase of an IRS Clearing Member's IRS Guaranty Fund contribution provided by this Rule 8G07.1(iii) for good cause shown by the affected IRS Clearing Member.

"Specified Attendance Failure Amount" means, for an IRS Clearing Member whose trader fails to attend an Active IRS Default Management Committee, an amount equal to the product of (i) the aggregate Specified Attendance Failure Percentages for such IRS Clearing Member and (ii) such IRS Clearing Member's contribution to the IRS Guaranty Fund at the beginning of the IRS Cooling-off Period during which the relevant Active IRS Default Management Committee was convened, subject to:

(x) a minimum amount equal to 50% of the amount specified in Rule 8G07.1(ii)(b); and

(y) a maximum amount equal to the lesser of (i) 10% of the IRS Guaranty Fund at the beginning of the IRS Cooling-off Period during which the relevant Active IRS Default Management Committee was convened and (ii) such IRS Clearing Member's contribution to the IRS Guaranty Fund at the beginning of the IRS Cooling-off Period during which the relevant Active IRS Default Management Committee was convened.

For the avoidance of doubt, in the event the minimum amount calculated under (x) exceeds the maximum amount calculated under (y), the maximum amount as calculated under (y) shall be applied.

"Specified Attendance Failure Percentage" means:

(x) 50%, for each failure of a swaptions trader required to attend or for each failure of a trader for interest rate swaps denominated in USD, EUR or GBP required to attend, or

(y) 25%, for each failure of any non-swaptions trader for interest rate swaps denominated in a currency other than USD, EUR or GBP required to attend.

2. The Clearing House shall calculate the aggregate required IRS Guaranty Fund and IRS Assessments on at least a monthly basis, as well as each IRS Clearing Member's required contribution to the Guaranty Fund and its maximum IRS Assessment.

Following any recalculation the Clearing House shall provide a report to each IRS Clearing Member

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showing the detail of its required deposit to the IRS Guaranty Fund and its maximum IRS Assessment. The notice shall specify the amount of any required additional deposit or any excess in the then-existing deposit amount. In the event that an interim report is issued within five business days prior to the regularly scheduled monthly report, the Clearing House may opt to forego the issuance of an additional month-end report, provided that the amount of resources required has not changed substantially during this period. An IRS Clearing Member shall make any required additional deposit within two business days after delivery of such report and any reported excess may be withdrawn.

3. If the Clearing House determines that an additional deposit to the IRS Guaranty Fund is required from an IRS Clearing Member due to a material change in the business of such IRS Clearing Member (for example, but without limitation, changes pursuant to a merger or a bulk transfer of customer positions), where such change produces an increase in such IRS Clearing Member's aggregate performance bond requirements of 10% or greater, the Clearing House shall notify such IRS Clearing Member of the additional requirement and the IRS Clearing Member shall make any required deposit no later than the second business day following delivery of such notice.

4. Any changes to the methodology for calculating the IRS Guaranty Fund and IRS Assessments as described in this Rule 8G07.1 or 8G07.2 that results in a 15% increase to the IRS Guaranty Fund and IRS Assessments over a 30 day period shall be effective on the earlier to occur of (i) the 20th Business Day following the date the Clearing House provides notice to IRS Clearing Members of such change and (ii) the date reasonably determined by the IRS Risk Committee (which shall be no less than two Business Days following notice of such change to the IRS Clearing Members) if such increase is due to applicable law, regulation or regulatory request. IRS Clearing Members shall make any required additional deposit on or prior to the date such change is effective.

Upon receipt of notice of a 15% increase to the IRS Guaranty Fund and IRS Assessments pursuant to the preceding paragraph, an IRS Clearing Member may immediately notify the Clearing House and such IRS Clearing Member's customers of its intent to withdraw from status as an IRS Clearing Member. The notice shall specify that customers must close out or transfer to another IRS Clearing Member their affected open positions, and that the withdrawing IRS Clearing Member shall have the right to liquidate any customer positions that remain open on its books after 10 business days have passed from the customers' receipt of such notice. If any customer fails to close out or transfer to another IRS Clearing Member during such 10 business day period, the IRS Clearing Member shall have the right to liquidate any such customer position that remains open on its books.

For the avoidance of doubt, nothing in this Rule 8G07.4 shall apply to any increase to the IRS Guaranty Fund and IRS Assessments resulting from periodic calculations of the IRS Guaranty Fund and IRS Assessments pursuant to Rule 8G07.2 or any additional deposit to the IRS Guaranty Fund required by an individual IRS Clearing Members pursuant to Rule 8G07.3.

8G08. LIEN ON COLLATERAL

Each IRS Clearing Member hereby grants to the Clearing House to secure obligations of such IRS Clearing Member to the Clearing House a first priority and unencumbered security interest and lien against any property, cash, securities or collateral deposited with, transferred or pledged to, or otherwise where control is given to the Clearing House by the IRS Clearing Member. IRS Clearing Members shall take any action that may be required by the Clearing House to create, preserve, perfect, validate or enforce any such security interest.

8G09. CUSTOMER REGISTRATION

All IRS Contracts including, but not limited to, give-ups or transfers that are cleared at CME shall be identified with an account number which identifies the originator of that transaction, specifying whether the transaction was executed as a proprietary transaction of the IRS Clearing Member or arises from a transaction by a customer. IRS Clearing Members shall register, on CME-approved forms, all of the "ultimate" (or end) customer.

8G10 RISK MANAGEMENT

IRS Clearing Members will be subject to risk management and monitoring practices by CME relating to transactions submitted to the Clearing House. IRS Clearing Members shall promptly provide all information requested by Clearing House staff, including, without limitation, information respecting risk,

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settlement, liquidity, and operational issues. IRS Clearing Members shall make information and documents regarding their risk management policies, procedures and practices available to the CFTC upon the CFTC's request.

In limited circumstances, the Clearing House may decline to accept certain IRS Product trades or migration positions if the Clearing House determines in good faith that, based on the exercise of prudent risk management standards, the Clearing House should not accept the IRS Product trades or migration positions. In the event that the Clearing House declines to accept certain IRS Product trades or migration positions, it shall incur no liability with respect to the trades and positions that are not accepted. It shall be the sole responsibility of the IRS Clearing Members who are parties to such trades or positions to take action as they deem necessary or proper for their own protection.

In addition, if the Clearing House determines in good faith that, based on the exercise of prudent risk management standards, that an IRS Clearing Member poses undue risk to the Clearing House based on its IRS Product portfolio, the Clearing House may take any or all of the following actions with respect to such IRS Clearing Member: 1) impose an additional performance bond requirement; 2) prohibit the addition of any new IRS Contract positions, or 3) require the reduction or unwinding of IRS Contract positions.

IRS Clearing Members shall permit on-site risk reviews in accordance with CME Rules and subject to reasonable standards of confidentiality. IRS Clearing Members will also be subject to on-going oversight by the IRS Risk Committee regarding their IRS activities related to the CME Clearing House. All such inquiries shall be conducted in a manner consistent with oversight of IRS Clearing Members and in accordance with reasonable standards of confidentiality.

8G11-13. [RESERVED]

8G14. MITIGATION OF IRS LOSS

In the event of a default by an IRS Clearing Member, all IRS Clearing Members shall work cooperatively with their customers, other IRS Clearing Members and the Clearing House to administer the mitigation of any losses that may occur as a result of such default and shall ensure that resources required to be provided by IRS Clearing Members to the Active IRS Default Management Committee are promptly made available.

IRS Clearing Members shall work cooperatively with the Clearing House, the IRS Risk Committee and the Active IRS Default Management Committee to (i) mitigate any losses that may occur as a result of a default, (ii) liquidate the defaulted IRS Clearing Member's IRS Contracts, (iii) bid in each Default Management Auction as required by the Clearing House and (iv) take any other action reasonably requested by the IRS Risk Committee.

8G15. [RESERVED]

8G16. FINANCIAL CALCULATIONS

Financial calculations required for IRS Contracts will be performed by CME Clearing on the date such IRS Contracts are cleared in the Clearing House in accordance with CME Clearing's procedures. Financial calculations for IRS Contracts that are received and processed after the daily clearing cycle will be performed on the next Business Day.

8G17. IRS CLEARING SERVICE ACCESS

CME shall provide open access to its IRS Contract clearing services for any execution venue or trade processing or confirmation service that desires to facilitate the submission of IRS Product transactions to the Clearing House for clearing, subject to the Clearing House's normal operational requirements applied to all such third-party services, including the requirement, in this instance, that an IRS Clearing Member guaranty all transactions in IRS Products that are submitted to the Clearing House for clearing.

8G18. IRS SWAPTIONS MEMBERSHIP

8G18.A. IRS Swaptions Eligibility

1. An IRS Clearing Member interested in clearing IRS Swaptions must demonstrate to CME Clearing it has the ability, commitment and expertise to risk manage IRS Swaptions and has the operational capability to clear IRS Swaptions.

2. IRS Clearing Members interested in clearing IRS Swaptions are required to respond to a

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questionnaire and are subject to CME Clearing diligence for assessment that such IRS Clearing Member has sufficient internal market risk, credit risk and operational risk processes and management frameworks to clear IRS Swaptions, including the ability to properly measure, monitor and limit risks associated with clearing IRS Swaptions.

3. Each IRS Swaptions Clearing Member shall submit to ongoing diligence reviews by CME Clearing.

4. Each IRS Swaptions Clearing Member shall nominate IRS Swaptions trader(s) to the IRS Default Management Committee.

5. "IRS Swaptions Clearing Member" means an IRS Clearing Member that has been approved by the Clearing House as eligible to clear IRS Swaptions.

8G18.B. IRS Swaptions Information Submissions

1. Each IRS Swaptions Clearing Member shall submit the IRS Swaptions Information Submission File on each Business Day at the time specified by the Clearing House for each IRS Swaptions currency it is eligible to clear. The information submitted by an IRS Swaptions Clearing Member in the IRS Swaptions Information Submission File shall be consistent with the information used by the IRS Swaptions Clearing Member for its internal valuation of IRS Swaptions.

"IRS Swaptions Information Submission File" means the file containing the requested market data, internal price levels and such other information as specified by the Clearing House for each moneyness/expiry/tenor combination.

2. "Failed IRS Swaptions Submission" means a failure to submit (i) all or a portion of an IRS Swaptions Information Submission File at or prior to the time designated by the Clearing House or (ii) the IRS Swaptions Information Submission File in the proper format.

3. During a calendar month that is not during an IRS Cooling Off Period, an IRS Swaptions Clearing Member will be assessed a penalty per Failed IRS Swaptions Submission based on the following table:

# of Failed IRS Swaptions Submissions for that month	Penalty per Failed IRS Swaptions Submission
1	0
2	$10,000
3	$50,000
4+	$100,000

During an IRS Cooling Off Period, an IRS Swaptions Clearing Member will be assessed a penalty per Failed IRS Swaptions Submission based on the following table:

# of Failed IRS Swaptions Submissions for that month	Penalty per Failed IRS Swaptions Submission
1	0
2	$30,000
3	$150,000
4+	$300,000

Penalties shall be assessed monthly and payable with the IRS Guaranty Fund payment cycle. In addition, the IRS Swaptions Clearing Member may be referred to the Chief Regulatory Officer for potential further disciplinary action. Penalties from Failed IRS Swaptions Submissions shall become part of the IRS Priority of Payments as additional CME IRS Contribution to the IRS Priority of Payments pursuant to CME Rule 8G802 and shall be applied to IRS Losses on a pro rata basis with other CME IRS Contribution.

8G18.C. Withdrawal from IRS Swaptions Clearing Membership

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An IRS Swaptions Clearing Member that intends to no longer be eligible to clear IRS Swaptions shall provide written notice of such intent to the Clearing House. The IRS Swaptions Clearing Member's withdrawal shall be effective on the earlier of (i) the date Clearing House Staff approves such withdrawal and (ii) the 10th Business Day following the date of the clearing cycle in which the withdrawing IRS Swaptions Clearing Member liquidates or transfers to an appropriate IRS Swaptions Clearing Member all of its open customer and house positions in IRS Swaptions (such earlier date, the "IRS Swaptions Withdrawal Date"). Promptly following the IRS Swaptions Withdrawal Date, the Clearing House shall post a notice of the IRS Swaptions Clearing Member's withdrawal from its eligibility to clear IRS Swaptions.

An IRS Swaptions Clearing Member withdrawing with an IRS Swaptions Withdrawal Date that is not during an IRS Cooling Off Period will not be responsible for the requirements of an IRS Swaptions Clearing Member following the IRS Swaptions Withdrawal Date. An IRS Swaptions Clearing Member withdrawing with an IRS Swaptions Withdrawal Date during an IRS Cooling Off Period shall remain liable for all requirements of IRS Swaptions Clearing Members until the end of the IRS Cooling Off Period in which it withdraws from eligibility to clear IRS Swaptions.

An IRS Swaptions Clearing Member may withdraw from eligibility to clear IRS Swaptions without withdrawing as an IRS Clearing Member.

8G19-24. [RESERVED]

8G25. ACTIVE IRS DEFAULT MANAGEMENT COMMITTEE

In the event of a potential or actual default with respect to IRS Contracts, an Active IRS Default Management Committee shall be convened which shall be comprised of traders nominated by IRS Clearing Members and approved by the Clearing House. The purpose of this committee shall be to advise the Clearing House with respect to issues arising from the potential or actual default of an IRS Clearing Member and to manage the process of the liquidation and/or transfer of such IRS Clearing Member's portfolio of IRS Contracts. Such advice may include advice on hedging the risk associated with a defaulted IRS Clearing Member's portfolio, structuring the defaulted IRS Clearing Member's portfolio for liquidation or transfer, and administration of the Default Management Auction process.

8G26. [RESERVED]

8G27. IRS RISK COMMITTEE

There shall be an IRS Risk Committee which shall serve to provide guidance to the Clearing House on general matters relating to IRS Products including risk management policies and practices. In addition to the responsibilities set forth in these Rules, the IRS Risk Committee shall have the composition, responsibilities and other characteristics as set forth in its Charter.

If the IRS Risk Committee determines that a IRS Clearing Member fails to meet the requirements for being an IRS Clearing Member or is in a financial or operational condition which jeopardizes or may jeopardize the integrity of the Clearing House, the IRS Risk Committee may, by majority vote:

1. Order the IRS Clearing Member or its customers to deposit such additional performance bond with the Clearing House as deemed appropriate to protect the integrity of open contracts;

2. Prescribe such additional capital or other financial requirements as it deems appropriate;

3. Impose position limits on IRS Clearing Members based on their regulatory capital and such other criteria as it deems appropriate;

4. Suspend an IRS Clearing Member, subject to approval of any two of the following individuals: the Chief Executive Officer, the Global Head of Clearing, the Chairman of the Board, a Chairman of the IRS Risk Committee or the Chairman of the Clearing House Oversight Committee;

5. Order the IRS Clearing Member to cease and desist from the conduct found to be contrary to the best interests of the Clearing House; and/or

6. Order the liquidation or transfer of all or a portion of the open positions of the IRS Clearing Member; provided that all costs associated with any such liquidation and/or transfer shall solely be obligations of the IRS Clearing Member.

No person shall serve on the IRS Risk Committee unless they have agreed in writing that they will not publish, divulge, or make known in any manner, any facts or information regarding the business of any person or entity or any other information which may come to their attention in their official capacity as a member of the IRS Risk Committee, except when reporting to the Board or to a

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committee concerned with such information or to the Legal Department, Financial & Regulatory Surveillance Department or Market Regulation Department, when requested by the CFTC or other governmental agency or self-regulatory organization or when compelled in any judicial or administrative proceeding.

All information and documents provided to the IRS Risk Committee and all deliberations and documents related thereto shall be treated as non-public and confidential and, subject to the provisions in the previous paragraph, shall not be disclosed, except as necessary to further a Clearing House investigation or as required by law.

8G28. WIND UP OF IRS CLEARING OPERATIONS

Without prejudice to any other provision within this chapter 8G, the Exchange may wind-up clearing operations for IRS Products in the following situations:

(a) As a result of a default in which the IRS financial safeguards package is exceeded, producing an IRS Termination Event, as defined in Rule 8G802.B.5. In such case, the Clearing House shall close out all open IRS Contracts in accordance with the provisions of Rule 8G802.B.6.

(b) Following a default, during an IRS Cooling Off Period, as defined in Rule 8G802.H. In such case, the Clearing House shall provide such advance notice of termination as it determines to be reasonable and may establish other risk-reducing requirements, in both cases in consultation with the IRS Risk Committee. In such case, the Clearing House shall work with the IRS Risk Committee and IRS Clearing Members to provide for bulk porting of IRS Contracts and collateral to another clearing house that is willing to receive such positions, liquidation and/or termination of IRS Contracts, to the extent practicable under the circumstances. The final close-out of any open IRS Contracts on the termination date shall be conducted as set forth below.

(c) Upon the determination of the Exchange to cease providing clearing services for IRS Products for any reason. Without prejudice to (b) above, in such case, the Clearing House shall provide not less than 90 days written notice to IRS Clearing Members and market participants of the final date of termination. The Clearing House shall work with the IRS Risk Committee and IRS Clearing Members to ensure an orderly termination process, including providing for bulk porting of IRS Contracts and collateral to another clearing house that is willing to receive such positions, and liquidation and/or termination of IRS Contracts. The final close-out of any open IRS Contracts on the termination date shall be conducted as set forth below.

If clearing services for IRS Products are terminated pursuant to paragraph (b) or (c) above, on the effective date of termination specified in the notice, the Clearing House shall fix a U.S. dollar amount (the “Close-out Value”) to be paid to or received from the Clearing House in respect of all IRS Contracts to be terminated, by conducting a special settlement cycle to determine a final settlement price for all open IRS Contracts. Using such Close-out Value, the Clearing House shall determine for each IRS Clearing Member its total net pay obligation to, or net collect expectation from, the Clearing House in respect of its terminated proprietary and customer positions in IRS Contracts, if any. The Clearing House shall make payment to each IRS Clearing Member with a net collect, and each IRS Clearing Member with a net pay shall pay such amount to the Clearing House. The Clearing House may require pays from IRS Clearing Members to be funded immediately prior to making payment on collects. If any IRS Clearing Member fails to make a final payment to the Clearing House pursuant to this Rule 8G28, it shall be declared in default and the Clearing House shall process the default in accordance with Rule 8G802 as part of the final termination process. Promptly following the termination of all open IRS Contracts pursuant to this Rule 8G28 the Clearing House shall release to IRS Clearing Members their remaining contributions to the IRS Guaranty Fund.

8G29-599. [RESERVED]

8G600. DISPUTES RELATING TO IRS PRODUCTS

Neither the Clearing House nor any committee of the Exchange shall address disputes among IRS Clearing Members and/or IRS Participants relating to any matter regarding the execution of any IRS Contract or any IRS Product. A sub-committee of the IRS Advisory Committee shall be responsible for the arbitration of disputes and claims among IRS Clearing Members, clients and/or CME relating to the submission of IRS Products for clearing at the Clearing House and other matters related to clearing at the Clearing House. The Chairman of the IRS Advisory Committee shall have the discretion to determine whether the dispute is or is not arbitrable under these Rules.

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8G601-801. [RESERVED]

8G802. PROTECTION OF CLEARING HOUSE

8G802.A. Default by IRS Clearing Member

The Clearing House shall establish a separate guaranty fund for IRS Contracts (the "IRS Guaranty Fund"). Each IRS Clearing Member shall contribute to the IRS Guaranty Fund in accordance with the requirements of Rule 8G07. A non-defaulted IRS Clearing Member's deposit to the IRS Guaranty Fund may be applied by the Clearing House in accordance with this Rule 8G802 to mitigate any loss to the Clearing House attributable to IRS Contracts and will not be applied to losses in any other product classes.

1. *Default by IRS Clearing Member*

   (i) If an IRS Clearing Member (i) fails to promptly discharge any obligation to the Clearing House or (ii) becomes subject to any bankruptcy, reorganization, arrangement, insolvency, moratorium, or liquidation proceedings, or other similar proceedings under U.S. federal or state bankruptcy laws or other applicable law, the Clearing House may declare such IRS Clearing Member to be in default. If an Affiliate of an IRS Clearing Member fails to discharge any obligation to the Clearing House and the Clearing House determines that the default by such Affiliate is likely to cause a default of the IRS Clearing Member, the Clearing House may declare such IRS Clearing Member to be in default.

   Upon a default, the Clearing House shall act promptly to mitigate any loss caused by such default. The Clearing House may engage in any commercially reasonable transaction or action contemplated by the Rules and the IRS Default Management Guidelines, to manage, eliminate or reduce the risk created by the default, including but not limited to, entering into hedges, liquidating positions in the market, auctioning or selling a portion or all of the portfolio of the defaulting firm and, if applicable, its customers, and combining or offsetting by book-entry positions in eligible accounts of one or more defaulters. The Clearing House shall maintain plans for managing the default of an IRS Clearing Member (including the "IRS Default Management Guidelines"). An IRS Clearing Member that clears or plans to clear IRS Products at the Clearing House may obtain a copy of the IRS Default Management Guidelines on a confidential basis All information received by a Clearing Member, its affiliate or customer in connection with the Clearing House's liquidation and default management processes shall be treated as confidential.

   With respect to each hedging or liquidation transaction in a contract that the Clearing House executes via book-entry, the provisions in the second paragraph of Rule 804 shall apply as if there were a substitution.

   All obligations, costs and expenses incurred by entering into any transactions under the Rules shall be an obligation of the defaulted IRS Clearing Member to the Clearing House.

   (ii) Defaults by different IRS Clearing Members will each be considered a separate default event. After an IRS Clearing Member has been declared in default, subsequent failures by such defaulted IRS Clearing Member to discharge any obligation shall be considered part of the same original default and shall not be considered separate default events, unless and until the original default has been fully resolved and such IRS Clearing Member has been restored to good standing or is no longer an IRS Clearing Member.

   (iii) The defaulted IRS Clearing Member shall not take any action that would interfere with the ability of the Clearing House to mitigate the loss or to apply the assets of the defaulted IRS Clearing Member to offset any loss. The defaulted IRS Clearing Member shall not file any action in any court seeking to stay the actions of the Clearing House with respect to the default.

   (iv) A defaulted IRS Clearing Member shall immediately make up any deficiencies in its IRS Guaranty Fund deposit resulting from such default and in any event no later than the close of business on the banking day following demand by the Clearing House.

2. *Application of Defaulted IRS Clearing Member's Collateral; Rights and Obligations of Clearing House*

Upon the default of an IRS Clearing Member IRS Collateral shall be applied by the Clearing House to discharge any loss to the Clearing House associated with such default (an "IRS Loss") in accordance with and subject to this Rule 8G802. An IRS Loss shall include, but shall not be limited to, costs associated with the liquidation, transfer and managing of IRS Contracts of the defaulted

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IRS Clearing Member, hedging costs and other costs incurred by the Clearing House related to managing the risk surrounding the default of the IRS Clearing Member.

An IRS Loss arising in the defaulted IRS Clearing Member's proprietary account class shall be satisfied from the IRS Collateral. An IRS Loss resulting from any cleared swaps customer of a defaulted IRS Clearing Member shall be satisfied by application of performance bond, excess performance bond, other collateral and settlement variation gains ("IRS Customer Collateral") held for the respective cleared swaps customer consistent with Part 22 of the CFTC's regulations. After finalizing the IRS Loss of the defaulted IRS Clearing Member's proprietary account, the Clearing House shall reserve any excess IRS Collateral that remains first, to satisfy any IRS Loss arising in the defaulted IRS Clearing Member's customer account class for IRS Contracts, and second, to satisfy any losses to the Clearing House arising in other product classes, including, but not limited to, pursuant to Rule 818; provided however that such excess IRS Collateral shall not be applied to an IRS Loss arising from the IRS Contracts of a defaulted cleared swaps customer until after any permitted application of IRS Customer Collateral held in such customer account class.

Any remaining IRS Customer Collateral of a customer of an IRS Clearing Member following final resolution of any IRS Loss attributed to such customer shall remain in such customer account class, where it may be used to satisfy losses of such customer to the Clearing House arising in such account class with respect to other product classes Any customer assets used by the Clearing House to cure an IRS Loss associated with a customer account shall not be added to the defaulted IRS Clearing Member's collateral generally. The Clearing House shall not use IRS Customer Collateral to satisfy a payment obligation, realized loss or expense to the Clearing House in respect of the defaulted IRS Clearing Member's proprietary account.

Should an IRS Loss continue to exist after application of the amounts above, any remaining deficiency shall be satisfied pursuant to the procedures in Rule 8G802.B, in accordance with Part 22 of the CFTC's regulations as applicable. Any such amount shall continue to be a liability of the defaulted IRS Clearing Member to the Clearing House, which the Clearing House may collect from any other assets of such clearing member or by process of law.

8G802.B. Satisfaction of Clearing House Obligations

1. Application of Clearing House and non-defaulting IRS Clearing Member contributions

If the IRS Collateral and the IRS Customer Collateral, as described in Rule 8G802.A, is insufficient to cover the IRS Loss produced by the default, the Clearing House shall cover, or reduce the size of, such IRS Loss by applying the following funds to such losses in the order of priority as follows (the "IRS Priority of Payments"):

(i) First, the corporate contribution of CME for IRS Products (the "CME IRS Contribution"), which shall equal $150,000,000;

(ii) Second, the IRS Guaranty Fund (excluding the contribution of the defaulted IRS Clearing Member), which shall be applied in the following manner:

  (a) the IRS Guaranty Fund contribution of Subordinated Bidders equal to the relevant Aggregate Subordinated Amounts of such Subordinated Bidders applied on a *pro rata* basis until the entire IRS Loss is allocated; then, to the extent not all IRS Losses have been applied after application pursuant to this sub-section (a);

  (b) the (remaining) IRS Guaranty Fund of all IRS Clearing Members (excluding an amount of the IRS Guaranty Fund of each Winning Bidder equal to the Final Aggregate Seniorized Amounts for such Winning Bidders) will be applied pro rata until the entire IRS Loss is allocated; then, to the extent not all IRS Losses have been applied after application pursuant to this sub-section (b); and

  (c) the (remaining) IRS Guaranty Fund of all Winning Bidders will be applied *pro rata*;

(iii) Third, IRS Assessments against all IRS Clearing Members (excluding any defaulted IRS Clearing Members), which shall be assessed against each non-defaulted IRS Clearing Member pro rata in proportion to their required contributions to the IRS Guaranty Fund in accordance with Rule 8G07. Assessments against non-defaulted IRS Clearing Members shall be subject to a maximum of the maximum IRS Assessment assigned to such IRS Clearing Member pursuant to Rule 8G07 at the

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time of the default, and also subject to the limits set forth in Rule 8G802.H in the case of multiple successive defaults.

Non-defaulted IRS Clearing Members and their customers shall not take any action that would interfere with the ability of the Clearing House to collect and apply assets and proceeds in accordance with this Rule 8G802.B, including, but not limited to, attempting to obtain a court order. Determinations under this Rule 8G802.B that are based upon an IRS Clearing Member's IRS Guaranty Fund deposit and/or IRS Assessment requirement shall be based upon the requirement in effect at the time of the default.

As used herein:

"Aggregate Subordinated Amount" means the sum of all subordinated amounts as determined by the Clearing House in accordance with the IRS Default Management Guidelines.

"Final Aggregate Seniorized Amount" means the sum of all seniorized amounts as determined by the Clearing House in accordance with the IRS Default Management Guidelines.

"Subordinated Bidder" means in respect of each Default Management Auction, the IRS Clearing Member(s) whose IRS Guaranty Fund contribution is subject to subordination as determined by the Clearing House in accordance with the IRS Default Management Guidelines.

"IRS Default Management Guidelines" means the IRS Default Management Guidelines of the Clearing House.

"Winning Bidder" means, in respect of each Default Management Auction, the IRS Clearing Member(s) designated as such by the Clearing House with respect to such Default Management Auction.

2. *Modification of Clearing House's Obligations for IRS Contracts*

(a) If at any time following a default of an IRS Clearing Member, the assets available to cover the default under the preceding sections of Rule 8G802 are insufficient to satisfy the IRS Loss and obligations of the Clearing House to IRS Clearing Members as a result of such default, then absent an IRS Termination Event, the Clearing House shall, in a manner that is consistent with the requirements of the Commodity Exchange Act and the regulations adopted thereunder, conduct its next settlement cycle as described in Rule [8G802.B.2(b)].

(b) If the circumstances described in Rule [8G802.B.2(a)] occur, the Clearing House shall issue a Clearing Advisory Notice to inform IRS Clearing Members and their customers of such circumstances and conduct a settlement cycle to determine settlement prices for all IRS Contracts and the net portfolio gain or loss for each IRS Clearing Member and its customers, in accordance with the following:

(i) The net portfolio gain of an IRS Clearing Member (a "collect"), or the net portfolio loss of an IRS Clearing Member (a "pay"), shall be determined separately for:

(A) the IRS Clearing Member's proprietary positions in IRS Contracts (the net portfolio gain or net portfolio loss for such positions, a "Proprietary IRS Collect" or a "Proprietary IRS Pay"), and

(B) the positions in IRS Contracts of each customer of the IRS Clearing Member held in an account consistent with Part 22 of the CFTC's regulations (each customer's net portfolio gain or net portfolio loss for such positions, an "Individual Customer IRS Collect" or an "Individual Customer IRS Pay").

(ii) The Clearing House Oversight Committee (after considering any recommendation of the IRS Emergency Financial Committee) may determine a maximum amount of position liquidation payments that may be included in the Aggregate IRS Collects, based upon then existing facts and circumstances, that it deems appropriate to mitigate further disruptions to the markets.

(iii) The Clearing House shall notify each IRS Clearing Member of the amount of its remaining IRS Assessments, Proprietary IRS Pays and Individual Customer IRS Pays and each IRS Clearing Member shall pay all such amounts no later than the time required for the relevant settlement cycle. If an IRS Clearing Member does not pay all such amounts to the Clearing House, the Clearing House shall determine such IRS Clearing Member to be in default and may take any of the actions specified in 8G802.A with respect to such IRS Clearing Member and its customers. Payments owed by each non-defaulted customer of

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the defaulted IRS Clearing Member shall be paid by such non-defaulted customer to the Clearing House in accordance with Rule 8G802.I.

(iv) If the amount of Aggregate IRS Available Funds received by the Clearing House exceeds the Aggregate IRS Collects, the Clearing House shall calculate reimbursements of, and distribute, the excess funds, in reverse order of the utilization of the IRS Priority of Payments.

(v) If the amount of the Aggregate IRS Collects exceed the amount of Aggregate IRS Available Funds received:

(A) the Clearing House shall notify IRS Clearing Members and provide an opportunity for IRS Clearing Members and their customers to make voluntary contributions to the Clearing House;

(B) if the amount of the Aggregate IRS Collects continues to exceed the amount of Aggregate IRS Available Funds after the Clearing House adds any voluntary contributions from Rule 8G802.B.2(b)(v)(A) to the Aggregate IRS Available Funds, then the Clearing House shall apply IRS Gains Haircuts (as defined below) to the Proprietary IRS Collects and Individual Customer IRS Collects for the current settlement cycle and each successor settlement cycle on the current Business Day and, unless a Bankruptcy Event has occurred, each of the next two Business Days in accordance with the following:

Proprietary IRS Collects and Individual Customer IRS Collects each shall be reduced on a pro rata basis according to the amount of such collects, to equal the amount of Aggregate IRS Available Funds received relative to the Aggregate IRS Collects (such process, an "IRS Gains Haircut");

(C) The Clearing House Oversight Committee may instruct the Clearing House to extend or reduce the number of days during which IRS Gains Haircuts are applied under the process under Rule 8G802.B.2(b)(v) by up to two Business Days at a time, provided that in no circumstance may the Clearing House conduct settlement cycles in which IRS Gains Haircuts are applied for longer than five Business Days. Before providing such instruction, the Clearing House Oversight Committee must consider any recommendation of the IRS Emergency Financial Committee. Any recommendation of the IRS Emergency Financial Committee and the decision of the Clearing House Oversight Committee, each regarding adjusting the duration of settlement cycles with IRS Gains Haircuts, must be based upon then existing facts and circumstances, be in furtherance of the integrity of the Clearing House and the stability of the financial system, and take into consideration the legitimate interests of clearing members and customers of clearing members.

(D) For each settlement cycle conducted in accordance with this subparagraph (v): For non-defaulted IRS Clearing Members, the Clearing House shall pay the haircut Proprietary IRS Collects and Individual Customer IRS Collects to IRS Clearing Members as soon as practicable after receipt of the Aggregate IRS Available Funds. For non-defaulted customers of a defaulted IRS Clearing Member, subject to applicable law, the Clearing House will account for Individual Customer IRS Collects owed to each customer.

(c) If a Bankruptcy Event occurs (i) following a default of an IRS Clearing Member and (ii) during the IRS Cooling Off Period, all IRS Contracts shall be terminated promptly in accordance with Rule [8G802.B.6].

3. *IRS Partial Tear-Ups and IRS Full Tear-Ups*

(a) The Clearing House may, at any time following a default of an IRS Clearing Member, notify IRS Clearing Members and provide an opportunity for IRS Clearing Members to voluntarily agree to have their proprietary positions or, with a customer's consent, to agree to have each such customer's positions, extinguished by the Clearing House.

(b) If proprietary or customer positions in IRS Contracts of a defaulted IRS Clearing Member remain open (the "Remaining Open IRS Positions") following the last settlement cycle conducted pursuant to Rule 8G802.B.2, the Clearing House shall extinguish the Remaining Open IRS Positions through a partial tear-up process ("IRS Partial Tear-Up") or a full tear-up process ("IRS Full Tear-Up") of proprietary and customer positions of non-defaulted IRS

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Clearing Members and non-defaulted customers of the defaulted IRS Clearing Member in accordance with the following:

i. The Clearing House Oversight Committee shall determine the appropriate scope of each IRS Partial Tear-Up or shall determine that an IRS Full Tear-Up is appropriate, in accordance with Part 22 of the CFTC's regulations. Before making such determination, the Clearing House Oversight Committee must consider any recommendation of the IRS Emergency Financial Committee. Any recommendation of the IRS Emergency Financial Committee and each determination of the Clearing House Oversight Committee made for purposes of this Rule 8G.802.B.3(b) must:

   A. be based upon then existing facts and circumstances;

   B. be in furtherance of the integrity of the Clearing House and the stability of the financial system;

   C. take into consideration the legitimate interests of clearing members and customers of clearing members; and

   D. aim to extinguish Remaining Open IRS Positions and any additional positions in IRS Contracts deemed necessary to mitigate further disruptions to the markets affected by the Remaining Open IRS Positions.

ii. Such IRS Partial Tear-Up may include, but need not be limited to, the following methods:

   A. *Tear-Up of Positions in IRS Contracts that Offset Remaining Open IRS Positions*

      Proportionate extinguishment of IRS Contracts held by non-defaulted IRS Clearing Members, their non-defaulted customers and the non-defaulted customers of the defaulted IRS Clearing Member whose positions offset the Remaining Open IRS Positions, relative to the size of the Remaining Open IRS Positions; and

   B. *Tear-Up of All Positions in IRS Contracts within a Product or Combination of Products.*

      Extinguishment of all open positions in IRS Contracts for a product or combination of products.

iii. An IRS Full Tear-Up would involve the extinguishment of all open positions in IRS Contracts.

(c) In connection with any settlement cycle with IRS Gains Haircuts, the Clearing House Oversight Committee may instruct the Clearing House to extinguish a portion of the Remaining Open IRS Positions through an IRS Partial Tear-Up of proprietary and customer positions of non-defaulted IRS Clearing Members and non-defaulted customers of the defaulted IRS Clearing Member. The Clearing House Oversight Committee would determine the appropriate scope of each such IRS Partial Tear-Up in accordance with the procedures set forth in Rule 8G802.B.3(b)(i) and (ii), except that each reference to "Remaining Open IRS Positions" shall mean the relevant portion of Remaining Open IRS Positions.

4. IRS Product Limited Recourse

If a default occurs, IRS Collateral, IRS Customer Collateral and the IRS Priority of Payments shall be the sole source of payments to cover the IRS Loss until the default is fully and finally resolved, as applicable. In the event the IRS Collateral, IRS Customer Collateral and the IRS Priority of Payments are insufficient to cover the IRS Loss, regardless of whether CME is able to require an IRS Clearing Member to cure a deficiency in the IRS Guaranty Fund because of the occurrence of a Bankruptcy Event (as such term is defined in Rule 818.A), IRS Clearing Members and the holders of IRS Contracts shall have no recourse to any other funds or any other entity, including without limitation the guaranty funds that support clearing of other products, CME, CME Group Inc. or any of its affiliates other than any amounts recovered as described in Rule 8G802.E.

5. IRS Termination Events

If at any time following a default: (a) the Clearing House is unable to cover a settlement variation payment obligation when due and has no expectation of accessing funds to permit it to cover such payment obligation (for example through access to credit lines or assessment funds), (b) the Clearing House determines (after consultation with the IRS Risk Committee) that the available IRS

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Collateral and the IRS Priority of Payments will be insufficient to satisfy Default Management Auction bid results for the defaulted IRS Clearing Member's portfolio, (c) the Clearing House otherwise determines (after consultation with the IRS Risk Committee) the IRS Loss will exceed the available IRS Collateral and IRS Priority of Payments, or (d) a Bankruptcy Event of the Exchange (each an "IRS Termination Event"), then all IRS Contracts shall be terminated and the IRS Collateral and IRS Priority of Payments shall be distributed in accordance with Rule 8G802.B.6 below. If the IRS Customer Collateral attributable to a cleared swaps customer of the defaulted IRS Clearing Member is sufficient to satisfy any IRS Loss associated with such cleared swaps customer, the IRS Customer Collateral shall be so applied and any remaining IRS Customer Collateral shall remain in such customer account class. The Clearing House shall, in a manner that is consistent with the requirements of the Commodity Exchange Act and the regulations adopted thereunder (including, without limitation Part 190 of the Regulations, if applicable) fix a U.S. dollar amount (the "IRS Close-Out Value") to be paid to or received from the Clearing House in respect of all IRS Contracts to be terminated by conducting a special settlement cycle to determine a final settlement price for all open IRS Contracts.

6. Termination of IRS Contracts on an IRS Termination Event; Netting and Offset

If an IRS Termination Event occurs as described in Rule 8G802.B.5, all IRS Contracts shall be terminated promptly. The Clearing House shall determine the amount to be paid to or collected from each non-defaulted IRS Clearing Member, and the IRS Collateral and IRS Priority of Payments shall be distributed, as follows:

(i) The Clearing House shall, in a manner that is consistent with the requirements of the Commodity Exchange Act and the regulations adopted thereunder (including, without limitation Part 190 of the Regulations, if applicable) fix a U.S. dollar amount (the "IRS Close-Out Value") to be paid to or received from the Clearing House in respect of all IRS Contracts to be terminated by conducting a special settlement cycle to determine a final settlement price for all open IRS Contracts.

(ii) The net portfolio gain of a non-defaulted IRS Clearing Member (a "collect"), or the net portfolio loss of a non-defaulted IRS Clearing Member (a "pay"), shall be determined separately for (a) its proprietary positions in IRS Contracts (a "Close-Out Proprietary IRS Collect" or a "Close-Out Proprietary IRS Pay") and (b) the positions of each of its customers in IRS Contracts (each, a Close-Out "Individual Customer IRS Collect" or a "Close-Out Individual Customer IRS Pay"), using the IRS Close-Out Value for IRS Contracts. The Clearing House shall also use the IRS Close-Out Value to determine a Close-Out Individual Customer IRS Collect or a Close-Out Individual Customer IRS Pay for each non-defaulted cleared swaps customer of a defaulted IRS Clearing Member. The sum of all Close-Out Proprietary IRS Collects and Close-Out Individual Customer IRS Collects shall be the "Aggregate Close-Out IRS Collects". The sum of all Close-Out Proprietary IRS Pays and Close-Out Individual Customer IRS Pays shall be the "Aggregate Close-Out IRS Pays".

(iii) The Clearing House shall determine the amount of each non-defaulted IRS Clearing Member's remaining payment obligations, if any, in respect of IRS Assessments (which, together with the CME IRS corporate contribution and any remaining IRS Guaranty Fund amounts and any IRS Assessments previously funded, constitute the "Remaining IRS Priority of Payments").

(iv) The Clearing House shall add any remaining IRS Collateral, IRS Customer Collateral (if applicable as described in Rule [8G802.A.2.] above) and Remaining IRS Priority of Payments to the Aggregate Close-Out IRS Pays, and deduct the amount of any uncovered IRS Loss (the sum of such amount, the "Aggregate Close-Out IRS Available Funds").

(v) The Clearing House shall then notify each IRS Clearing Member of the amount of its remaining IRS Assessments, Close-Out Proprietary IRS Pay and Close-Out Individual Customer IRS Pays and each IRS Clearing Member shall pay all such amounts no later than the time specified by the Clearing House in such notice. If an IRS Clearing Member does not make such payment, the Clearing House shall determine such IRS Clearing Member to be in default and may take any of the actions specified in 8G802.A with respect to such IRS Clearing Member and its customer. Payments owed by each non-defaulted customer of the defaulted IRS Clearing Member shall be paid by such non-defaulted customer to the Clearing House in accordance with Rule 8G802.I.

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(vi) If the amount of Aggregate Close-Out IRS Available Funds received by the Clearing House exceeds the Aggregate Close-Out IRS Collects, the Clearing House shall calculate reimbursements of the excess funds, in reverse order of the IRS Priority of Payments.

(vii) If the Aggregate Close-Out IRS Collects exceed the amount of Aggregate Close-Out IRS Available Funds received, the Clearing House shall haircut the amount of each Close-Out Proprietary IRS Collect (such haircut amount, the "Allocated Close-Out Proprietary IRS Collect") and Close-Out Individual Customer IRS Collect (such haircut amount, the "Allocated Close-Out Individual Customer IRS Collect") on a pro rata basis based on the amount of Aggregate Close-Out IRS Available Funds received relative to the amount of the Close-Out Proprietary IRS Collects and Close-Out Individual Customer IRS Collects (such process, a "Close-Out IRS Gains Haircut").

(viii) For non-defaulted IRS Clearing Members, the Clearing House shall pay the Close-Out Proprietary IRS Collect or Allocated Close-Out Proprietary IRS Collects, as applicable, and Close-Out Individual Customer IRS Collects or Allocated Close-Out Individual Customer IRS Collects, as applicable, as soon as practicable after receipt of the Aggregate Close-Out IRS Available Funds. For non-defaulted customers of a defaulted-IRS Clearing Member, subject to applicable law, the Clearing House will account for Individual Customer IRS Collects owed to each such non-defaulted customer.

(ix) Upon the completion of payments, all IRS Contracts shall be extinguished, and the Clearing House shall have no further access to funds or collateral in respect of IRS Contracts or IRS clearing activity of a non-defaulting IRS Clearing Member. For the avoidance of doubt, neither IRS Contracts that are extinguished under this Rule [8G802.B.6] nor any claims thereunder shall be available for netting under Rule 818.

7. No Claims Against the Exchange or Clearing House

(a) IRS Clearing Members, their affiliates and their customers shall have no claim against the Exchange, CME Group Inc. or any affiliates of the Exchange or CME Group or any directors, officers or employees of any of the foregoing, including but not limited to claims against any other guaranty fund established by the Exchange, CME Group Inc. or any of its affiliates with respect to losses suffered as a result of the application of any provision of this Rule 8G802.B.

No beneficial holder of an IRS Contract shall have any claim against its non-defaulted IRS Clearing Member as a result of the application of this Rule 8G802.B. other than any amounts recovered as described in Rule 8G802.E.

(b) Notwithstanding anything in subparagraph (a), IRS Clearing Members, for both their proprietary positions in IRS Contracts and their customers' positions in IRS Contracts, and non-defaulted customers of defaulted IRS Clearing Members will have a claim on any recovery from the defaulted IRS Clearing Member or the estate of the defaulted IRS Clearing Member in the amount of the IRS Gains Haircuts and Close-Out IRS Gains Haircuts, each in the aggregate, applied to such positions (such amount with respect to all non-defaulted IRS Clearing Members and their customers and the non-defaulted customers of the defaulted IRS Clearing Member, "Aggregate IRS Gains Haircuts"), as set forth more fully in Rule 8G802.E. If the recovery from the defaulted IRS Clearing Member is less than the Aggregate IRS Gains Haircuts, non-defaulted IRS Clearing Members and their customers and the non-defaulted customers of defaulted IRS Clearing Members will share pro rata in the recovery.

8. Non-Petition

No IRS Clearing Member and no customer of an IRS Clearing Member shall institute against, or join any other person in instituting against, the Exchange any bankruptcy, reorganization, arrangement, insolvency, moratorium, liquidation or examinership proceedings, or other similar proceedings under U.S. federal or state bankruptcy laws or other applicable law arising out of any claimed default by the Clearing House on an IRS Contract as a result of the termination of such IRS Contract and related payments in accordance with these Rules.

9. Fedwire and Satisfaction of IRS Assessments

All amounts assessed by the Clearing House against an IRS Clearing Member pursuant to this Chapter and any advance assessments pursuant to Rule 8G802.C where notice of such assessment is delivered to an IRS Clearing Member during the hours in which the Federal Reserve's wire transfer system (Fedwire) is in operation shall be paid to the Clearing House by

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such IRS Clearing Member prior to the close of the Fedwire on such day; provided, however, that where notice of such assessment is delivered to an IRS Clearing Member within one (1) hour prior to the close of Fedwire or after the close of Fedwire shall be paid to the Clearing House within one (1) hour after Fedwire next opens.

Any IRS Clearing Member that does not satisfy an assessment made pursuant to this Chapter 8G shall be in default. Any IRS Loss that occurs as a result of such default shall itself be assessed by the Clearing House to non-defaulted IRS Clearing Members pursuant to Rule 8G802.A and 8G802.B.

After payment of an IRS Assessment pursuant to Rule 8G802.B, an IRS Clearing Member shall charge other clearing members for whom it clears contracts or carries positions on its books to recover their proportional share of the assessment. Such other clearing members shall promptly pay the charge.

10. Details of Implementation

While adherence to the provisions of this Rule 8G802.B shall be mandatory, the detailed implementation of the process of finalizing an IRS Loss with respect to a default, including the liquidation, hedging, auction or sale of positions or assets of the defaulted IRS Clearing Member, shall be conducted by the Clearing House in consultation with the Active IRS Default Management Committee.

8G802.C. Limited Advance Assessment Authority

If a default occurs and the collateral for IRS Contracts of the defaulted IRS Clearing Member for its proprietary and customer accounts (including any IRS Contracts entered into by the Clearing House to hedge such defaulted Clearing Members' IRS Contracts) held by the Clearing House (after taking into account settlement variation payment obligations) is less than 50 percent of the performance bond requirement for IRS Contracts calculated using the performance bond methodology at the time of default, the Clearing House may issue an advance assessment demand to non-defaulted IRS Clearing Members to contribute capital up to a maximum of the amount that would be necessary to bring the collateral of the defaulted IRS Clearing Member to 100% of the relevant requirement. Any such assessment shall be subject to any cap on assessments pursuant to Rule 8G802.B and shall be made pro rata among IRS Clearing Members on the same basis as assessments under Rule 8G802.B.

8G802.D. Utilization of Remaining IRS Collateral of Defaulted IRS Clearing Member; Restoration of Funds Following Final Determination of Losses

1. After the default of an IRS Clearing Member is finally resolved, excess IRS Collateral of the IRS Clearing Member may be used by the Clearing House for losses to the Clearing House of such IRS Clearing Member for Base Products on a pro rata basis based on the amount of any unresolved losses for such product classes.

2. If, after the default of an IRS Clearing Member is finally resolved, the Clearing House determines that collateral of the defaulted IRS Clearing Member, surplus funds, IRS Guaranty Funds, IRS Assessments, other guaranty fund contributions, or assessment powers were employed in a manner different from what would have occurred had all assets been secured and liquidated immediately and the IRS Loss finalized simultaneously, then the Clearing House shall make distributions or rebalancing allocations to non-defaulted IRS Clearing Members and/or the guaranty funds, as appropriate.

8G802.E. Rights of Clearing House for Recovery of Loss

Losses caused by the default of an IRS Clearing Member are amounts due to the Clearing House from such IRS Clearing Member and shall remain legal obligations thereof notwithstanding the Clearing House's recourse to the loss-mutualization provisions of this Rule 8G802 and Rule 802, which amounts the Clearing House shall take commercially reasonable steps to recover (including claims submitted in an insolvency or resolution proceeding). If any portion of these amounts is subsequently recovered by the Clearing House, the net amount of such recovery shall be credited to non-defaulted IRS Clearing Members (whether or not they are still IRS Clearing Members at the time of recovery) on a pro rata basis based on (1) the amount of their (and their customers', if applicable) voluntary contributions with respect to such default, (2) the amount of their (and their customers', if applicable) Aggregate IRS Gains Haircuts with respect to such default, (3) the amount of their IRS Assessments utilized by the Clearing House with respect to such default, and (4) the amount of their guaranty fund contribution utilized by the Clearing House with respect to such default, each in the order listed, and then to the Exchange for the amount of the CME

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Contribution utilized by the Clearing House with respect to such default..

If an IRS Clearing Member clears contracts or carries positions for other clearing members and such other clearing members were required to pay an assessment pursuant to Rule 8G802.B, such IRS Clearing Member shall return to such other clearing members, a pro rata share of any recoveries received by such IRS Clearing Member which shall be calculated on the basis of the assessed amount paid by the other clearing member relative to the total assessment paid by the IRS Clearing Member.

8G802.F. IRS Guaranty Fund Contributions to be Restored

In the event it shall become necessary to apply all or part of the IRS Guaranty Fund to meet obligations to the Clearing House pursuant to this Rule 8G802, IRS Clearing Members shall restore their deposits to the IRS Guaranty Fund to previously required level prior to the close of business on the next banking day after notice that such amount is due from the Clearing House, subject to the maximum obligations to contribute to the IRS Guaranty Fund and to fund IRS Assessments set forth in 8G802.H.

8G802.G. Default Management Across Account Classes

Subject to Rule 8G831, the procedures set forth in 8G802.A and 8G802.B shall be conducted separately by the Clearing House with respect to open positions and associated performance bond deposits for different product classes and account classes. Upon a default, the Clearing House may, in accordance with applicable law, act immediately to attempt to transfer to alternate IRS Clearing Members part or all customer positions and associated performance bond collateral with respect to any cleared swaps customer that has not defaulted on payment obligations.

8G802.H. IRS Cooling Off Period and Multiple Defaults

The provisions set forth in Rule 8G802.A and 8G802.B shall apply with respect to each default by an IRS Clearing Member. If more than one IRS Clearing Member default occurs at a time or in close sequence, including a default that occurs by reason of an IRS Clearing Member's failure to satisfy an assessment demand, the Clearing House shall manage the defaults separately. Upon a default, non-defaulted IRS Clearing Members shall be subject to a maximum obligation to contribute to the IRS Guaranty Fund and to fund IRS Assessments equal to the aggregate amounts set forth in Rules 8G07 and 8G802. This maximum shall apply from the date of the original default until the later of (i) the 25th Business Day thereafter and (ii) if another IRS Clearing Member is in default during the 25 Business Days following the initial or any subsequent default, the 25th Business Day following the last default (the "IRS Cooling Off Period"), regardless of the number of defaults that occur during such IRS Cooling Off Period.

The maximum does not limit IRS Clearing Members' obligations to restore their IRS Guaranty Fund contributions as set forth in Rule 8G802.F, except that if the IRS Clearing Member's required IRS Guaranty Fund contribution would exceed the maximum, the IRS Clearing Member's IRS Guaranty Fund requirement shall be reduced accordingly for the remainder of the IRS Cooling Off Period. Following an IRS Cooling Off Period, the Clearing house shall notify each IRS Clearing Member of its IRS Guaranty Fund deposit obligation and its IRS Assessments exposure.

The aggregate maximum contribution for the IRS Cooling Off Period shall be based upon each IRS Clearing Member's IRS Guaranty Fund requirement and IRS Assessments in effect at the time of the original default, provided that if an IRS Clearing Member's IRS Guaranty Fund requirement and IRS Assessments is increased during the IRS Cooling Off Period due to material changes in its own business creating a material shortfall as to the requirement (as described in Rule 8G07) then the maximum shall be based on the revised requirement.

The CME IRS Contribution shall be limited to an aggregate maximum of $150,000,000 during the Cooling Off Period, regardless of the number of defaults that occur during such Cooling Off Period.

8G802.I. Post-Default Cleared Swaps Customer Account Processing

1. In order to minimize disruptions and loss to its public customers if an IRS Clearing Member defaults, each IRS Clearing Member shall cause its cleared swaps customers to establish arrangements to directly make all required performance bond and settlement variation payments directly to the Clearing House and to keep current and on file with the Clearing House any direction to transfer its open positions and collateral to another IRS Clearing Member.

2. The Clearing House shall treat positions and collateral of the cleared swaps customers of an IRS Clearing Member, which has been declared to be in default, in accordance with Part 22 of the

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CFTC's regulations. Immediately after the default of an IRS Clearing Member, the Clearing House shall cease netting settlement variation among the cleared swaps customers of the defaulted Clearing Member.

3. If the Clearing House ceases to net settlement variation margin of the customers of a defaulted IRS Clearing Member, the Clearing House will calculate the settlement variation margin obligation owed to each customer ("collects"), and also calculate the settlement variation margin obligation owed to the Clearing House by each customer ("pays"). The Clearing House will account for settlement variation margin collects owed to each customer. The Clearing House will procure customer settlement variation margin pays from the following sources:

(i) Directly from the obligated customer in accordance with the arrangements established pursuant to 8G802.I.1 or by attaching any excess collateral attributable to that customer; and

(ii) By means of liquidating the IRS collateral supporting the customer's position attributed to a customer that fails to make a required settlement variation payment when due. The proceeds of such liquidation shall be used to meet the customer's variation pay obligation to the clearing house. (If the collateral is liquidated, the positions supported by the collateral shall be promptly liquidated.)

4. Any unmet customer obligation to the Clearing House will be an "IRS Loss," per 8G802.A.2, and will be cured in accordance with the provisions of 8G802.B. Consistent with Part 22 of the CFTC's regulations, if the IRS Customer Collateral attributable to a cleared swaps customer of the defaulted IRS Clearing Member is sufficient to satisfy any IRS Loss associated with such cleared swaps customer, the IRS Customer Collateral shall be so applied and any remaining IRS Customer Collateral shall remain in such customer account class.

5. The Clearing House shall rely on its own books and records to identify the portfolio of rights and obligations arising from the IRS Contracts of each cleared swaps customer. To the extent the Clearing House's books and records are not available or the Clearing House determines that its books and records are not accurate, the Clearing House shall rely on the information provided by the defaulted IRS Clearing Member to identify the portfolio of rights and obligations arising from the IRS Contracts for each of its cleared swaps customers.

8G803-812. [RESERVED]

8G813. IRS SETTLEMENT PRICE

Settlement prices for IRS Contracts shall be determined each Business Day pursuant to one or more of the procedures set forth below.

1. The Clearing House shall determine settlement prices for such IRS Contracts based upon a consideration of relevant market data, including, but not limited to, trading activity, pricing data obtained from IRS Contract market participants, the settlement prices of related products and any other pricing data from sources deemed reliable by the Clearing House.

2. Notwithstanding the above, if a settlement price in any IRS Product, as derived by the normal methodology used for that IRS Product, is inconsistent with trades, bids or offers in other months/ strikes during the closing range, or other relevant market information, or if there is no relevant market activity, a Clearing House official may establish a settlement price that best reflects in its reasonable judgment the true market valuation at the time of the close.

3. Notwithstanding the above, in the case of inaccuracy or unavailability of a settlement price, or if a settlement price creates risk management concerns for the Clearing House, the Clearing House reserves the right to calculate settlement variation using an alternate price determined by the Clearing House.

8G814-820. [RESERVED]

8G821. EXCESS PERFORMANCE BOND OF IRS CLEARED SWAPS CUSTOMERS

IRS Clearing Members are permitted to transmit performance bond of its cleared swaps customers for IRS Products in excess of the amount required by the Clearing House in accordance with CME Rule 821.

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8G822-823. [RESERVED]

8G824. ADDITIONAL IRS PERFORMANCE BOND

Whenever, in the opinion of the IRS Risk Committee or the Global Head of Clearing or, in their absence, their delegate, unstable conditions relating to one or more products exist, they may from time to time, call for additional performance bond collateral from IRS Clearing Members. Such additional performance bond calls may be as much as or more than the original performance bond collateral. The performance bond collateral thus called for may be for one or more contract(s) from one or more IRS Clearing Member(s) and on long positions, short positions or both.

In the event market conditions and price fluctuations at any time shall cause the IRS Risk Committee or the Global Head of Clearing or, in their absence, their delegate, to conclude that additional performance bond collateral is required to maintain an orderly market or to preserve fiscal integrity the IRS Risk Committee or the Global Head of Clearing or their delegate may call for additional performance bond collateral to be deposited with the Clearing House during the next banking hour after demand therefor, or at such times as may be specified. Such additional performance bond collateral may be called from the longs or the shorts or from both.

When the IRS Risk Committee or the Global Head of Clearing or, in their absence, their delegate, shall be of the opinion that any IRS Clearing Member is carrying commitments or incurring risk in its proprietary, customer and/or cross-margin accounts, that are larger than is justified by the financial condition of that IRS Clearing Member, then the IRS Risk Committee or the Global Head of Clearing or, in their absence, their delegate, may require additional performance bond collateral of such IRS Clearing Member which shall be deposited with the Clearing House during the next banking hour after demand therefor, or at such time as may be specified, or a portion of the open positions of such IRS Clearing Member may be required to be transferred to the books of another IRS Clearing Member.

8G825-828. [RESERVED]

8G829. MEASURES TO MITIGATE PROCYCLICALITY

In order to limit procyclical performance bond changes, with respect to IRS contracts, the Clearing House shall establish performance bond requirements not lower than those that would be calculated using volatility estimated over a ten (10) year historical lookback period.

8G830. [RESERVED]

8G831. COMMINGLING OF ELIGIBLE FUTURES, OPTION ON FUTURES, AND SWAPS POSITIONS

The Clearing House shall determine Base Guaranty Fund Products that may be commingled with positions in IRS Contracts in order to provide risk offsets for proprietary and customer positions on the basis that the price risks with respect to such products are significantly and reliably correlated (such products, "Commingling Eligible Futures and Options on Futures Products"). Eligible Clearing Members and Affiliate Clearing Members may elect that any of their proprietary positions in Commingling Eligible Futures and Options on Futures Products be commingled with proprietary positions in IRS Contracts and subject to the financial safeguards package for IRS Contracts. Eligible Clearing Members may elect that any of their customer's positions in Commingling Eligible Futures and Options on Futures Products be commingled with such customer's positions in IRS Contracts and subject to the financial safeguards package for IRS Contracts. Commingled Futures and Options on Futures Positions will be subject to the risk methodology associated with IRS Contracts. Notwithstanding Rule 814, the Clearing House will not make variation settlement payments (but will require collections) associated with Commingled Futures and Options on Futures Positions during intra-day variation settlement cycles which do not include variation settlements for IRS Contracts. If the Clearing House determines at any time that any Commingled Futures and/or Options on Futures Positions are non-risk reducing, the Clearing House may either restrict such Eligible Clearing Member or Affiliate Clearing Member from commingling additional positions or require such Eligible Clearing Member or Affiliate Clearing Member to move and/or liquidate any of such Commingled Futures and/or Options on Futures Positions. At no time shall the risk of Commingled Futures and/or Options on Futures Positions exceed the risk of IRS positions within a commingled portfolio by more than $1m DV01. In the event of a default by an Affiliate Clearing Member or an Eligible Clearing Member, Commingled Futures and Options on Futures Positions of such Affiliate Clearing Member or such Eligible Clearing Member or its customers will be subject to the default management procedures of IRS Products. In the event of a

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default by an affiliated Base Clearing Member whose Affiliate Clearing Member holds Commingled Futures and Options on Futures Positions in an associated IRS account, the Affiliate Clearing Member must transfer, subject to the requirements under Rule 853, or liquidate the commingled Base Guaranty Fund Products in a timely manner, as required by the Clearing House. Notwithstanding the foregoing, the Clearing House reserves the right, but is not obligated, to assist the Affiliate Clearing Member in the transfer or liquidation of such commingled Base Guaranty Fund Products.

Upon the occurrence of an IRS Termination Event, (i) Commingled Futures and Options on Futures Positions will be subject to the risk methodology associated with futures and options on futures positions and subject to the Base Guaranty Fund, (ii) proprietary Commingled Futures and Options on Futures Positions of non-defaulted IRS Clearing Members will be removed from the associated IRS accounts of such IRS Clearing Member and moved (together with all performance bond of such IRS Clearing Member) to the relevant Base Guaranty Fund Product proprietary accounts of such Clearing Member (or its Base Clearing Member affiliate, as applicable) and (iii) Commingled Futures and Options on Futures Positions of customers of non-defaulted IRS Clearing Members will remain in the commingled portfolio and the associated performance bond will remain in the relevant Cleared Swaps Account of such IRS Clearing Member until transferred by the customer or Clearing Member to segregated accounts maintained in accordance with Section 4d of the CEA (such transfers shall occur as soon as reasonably practicable) and (iv) the Clearing House will make regular intraday variation settlement payments during intra-day settlement cycles.

"Affiliate Clearing Member" shall mean an IRS Clearing Member that (i) is affiliated with one or more Base Clearing Members; and (ii) has elected to commingle its proprietary positions in Commingling Eligible Futures and Options on Futures Products that are cleared by an affiliated Base Clearing Member and are beneficially owned by such IRS Clearing Member, with its proprietary positions in IRS Contracts. The Affiliate Clearing Member is deemed to represent that all such proprietary positions in Commingling Eligible Futures and Options on Futures Products it elects to commingle with its proprietary positions in IRS Contracts are beneficially owned by the IRS Clearing Member.

"Commingled Futures and Options on Futures Positions" shall mean any positions in Base Guaranty Fund Products commingled with positions in IRS Contracts in accordance with this Rule 8G831. As used in Rules 8G04, 8G14, 8G25, 8G28 (except for 8G28(a)), 8G600, 8G802.A, 8G802.B.2,3,7 and 8, 8G802.C, 8G802.I and 8G931, except as otherwise provided therein, the term "IRS Contracts" shall include Commingled Futures and Options on Futures Positions.

"Eligible Clearing Member" shall mean a firm that has been approved as a Clearing Member and an IRS Clearing Member.

8G832-912. [RESERVED]

8G913. WITHDRAWAL FROM IRS CLEARING MEMBERSHIP

8G913.A. Voluntary Withdrawal

An IRS Clearing Member that intends to withdraw from clearing membership for IRS Products shall provide written notice of such intent to the Clearing House and the Clearing House Oversight Committee. An IRS Clearing Member's withdrawal shall be effective on the earlier of (i) the date Clearing House Staff approves such withdrawal or (ii) the 10th Business Day following the date of the clearing cycle in which the withdrawing IRS Clearing Member liquidates or transfers to an appropriate IRS Clearing Member all of its open customer and house positions in IRS Contracts (such earlier date, the "IRS Withdrawal Date"); provided that the withdrawing IRS Clearing Member shall remain liable for IRS Guaranty Fund contributions and IRS Assessments in accordance with Rule 8G913.B. Promptly following the IRS Withdrawal Date, the Clearing House shall post a notice of the IRS Clearing Member's withdrawal.

An IRS Clearing Member may withdraw from serving as an IRS Clearing Member clearing IRS Products without withdrawing as a CME, CBOT, NYMEX or COMEX clearing member for any other products, if applicable.

8G913.B. Release of Guaranty Fund Deposit, Membership and Assignments

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When an IRS Clearing Member withdraws from clearing membership for IRS Products (whether voluntarily or involuntarily), its IRS Guaranty Fund deposit or any other deposits required by the Clearing House, and any remaining assets available to the Clearing House associated with IRS Products will be released when Clearing House staff determines that the following has occurred: (1) all contracts and obligations with the Clearing House relating to IRS Products have been settled and paid, (2) all sums owing to the Clearing House relating to IRS Products have been paid, (3) all obligations to other members and customers arising out of claims directly related to IRS Contracts have been paid or otherwise provided for, (4) all obligations to other members and customers arising out of other arbitration claims relating to IRS Products filed pursuant to Chapter 6 or Rule 8G600 have been paid or otherwise provided for, and (5) the requisite liquidity providers for the Clearing House have released the security interest in such IRS Clearing Member's "assets" associated with the clearing of IRS Products in accordance with the terms of the liquidity facility described in Rule 817; provided, however, that in the event that Clearing House staff determines that all of the foregoing other than (4) have occurred, the IRS Risk Committee may in its discretion authorize the release of such property.

Generally, no such property shall be released prior to the 60th day following the posting of the notice of the IRS Clearing Member's withdrawal. Notwithstanding the above, Clearing House staff may grant an exemption to the above restriction for good cause shown. Further, for purposes of the paragraph above, if the withdrawing IRS Clearing Member will not remain a clearing member in any other capacity with the Exchange, all obligations of the withdrawing IRS Clearing Member to the Exchange, of whatever nature or kind, shall be accelerated and become due and payable upon the effective date of withdrawal. If the IRS Clearing Member will remain a clearing member for other product classes other than IRS Products, the foregoing sentence shall apply only to obligations related to the clearing of IRS Products.

For purposes of Rule 8G802 and 8G07, the IRS Guaranty Fund contributions and IRS Assessments of a non-defaulted IRS Clearing Member that has withdrawn shall not be accessible by the Clearing House to satisfy any losses in respect of the default of another IRS Clearing Member where such default occurred after the IRS Cooling Off Period as of which the withdrawing IRS Clearing Member had liquidated or transferred all of its open customer and house positions in IRS. For the avoidance of doubt, a withdrawing IRS Clearing Member shall be subject to IRS Assessments for all defaults occurring during the Cooling Off Period in which such IRS Clearing Member withdraws.

8G913.C. Customer Positions of Withdrawing Clearing Member Following a Default

If, following a default that causes mutualized losses under Rule 8G802.B, an IRS Clearing Member notifies the Clearing House during the applicable IRS Cooling Off Period of its intent to withdraw from status as an IRS Clearing Member, the IRS Clearing Member shall promptly notify its customers in writing of such decision. The notice shall specify that customers must close out or transfer to another IRS Clearing Member their affected open positions, and that the withdrawing IRS Clearing Member shall have the right to liquidate any customer positions that remain open on its books after 10 business days have passed from the customers' receipt of such notice. If any customer fails to close out or transfer to another IRS Clearing Member during such 10 business day period, the IRS Clearing Member shall have the right to liquidate any such customer position that remains open on its books. The IRS Clearing Member shall cooperate with customers and with the Clearing House on any proposed transfer of customer positions, and shall include in its notice to customers such information as the Clearing House may require at the time regarding other IRS Clearing Members that may receive transfers of customer positions. With respect to customer positions in products that are listed for electronic trading on any exchange for which the Clearing House provides clearing services, the IRS Clearing Member shall liquidate such positions in the open market unless otherwise agreed with the customer. With respect to customer positions in IRS products that are not so listed for electronic trading, the IRS Clearing Member may liquidate such positions by submitting to the Clearing House for clearing an offsetting trade executed at a commercially reasonable price reflecting the clearing member's side of the market (*i.e.*, the bid side if liquidating a long position and the offer side if liquidating a short position), taking into account any pricing information that is available to it in the market at the time, which pricing information shall be shared with the Clearing House and the customer. Each IRS Clearing Member will promptly provide to its customers reasonable detail of how it determined the liquidation amount for any liquidation effected pursuant to this Rule 8G913.C.

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8G914-929. [RESERVED]

8G930. IRS PERFORMANCE BOND REQUIREMENTS

8G930.A. Performance Bond System

A Performance Bond System will be adopted by the Exchange.

Performance bond systems other than the Exchange adopted system may be used to meet Exchange performance bond requirements if the IRS Clearing Member can demonstrate that its system will always produce a performance bond requirement equal to or greater than the CME Clearing performance bond requirements.

8G930.B. Performance Bond Rates for IRS Products

Exchange staff shall determine initial and maintenance performance bond rates used in determining Exchange performance bond requirements.

8G930.C. Acceptable Performance Bond Deposits for IRS Products

IRS Clearing Members may accept from their account holders as performance bond cash currencies of any denomination, readily marketable securities (as defined by SEC Rule 15c3-1(c)(11) and applicable SEC interpretations), money market mutual funds allowable under CFTC Regulation 1.25, bank–issued letters of credit, gold warrants that are registered as deliverable for gold futures contracts traded on Commodity Exchange, Inc., and "London Good Delivery" gold, as defined by the London Bullion Market Association.

IRS Clearing Members shall not accept as performance bond from an account holder securities that have been issued, sponsored or otherwise guaranteed by the account holder or an affiliate of the account holder unless the IRS Clearing Member files a petition with and receives permission from Clearing House staff.

Unless permitted (either not restricted or specifically authorized) by OFAC and/or any Sanctioning Body, as applicable, IRS Clearing Members may not accept from their account holders as performance bond any debt or equity issued by Sanctioned Parties as defined in Rule 543, assets in which Sanctioned Parties have an interest, or any other assets that are or would be subject to blocking restrictions or sectoral sanction restrictions imposed by the U.S. Department of Treasury's Office of Foreign Assets Control or are subject to similar restrictions imposed by another Sanctioning Body.

Bank-issued letters of credit must be in a form acceptable to the Clearing House. Such letters of credit must be drawable in the United States. IRS Clearing Members shall not accept as performance bond from an account holder letters of credit issued by the account holder, an affiliate of the account holder, the clearing member, or an Affiliate of the clearing member.

All assets deposited by account holders to meet performance bond requirements must be and remain unencumbered by third party claims against the depositing account holder.

Except to the extent that Clearing House staff shall prescribe otherwise, cash currency performance bond deposits shall be valued at market value. All other performance bond deposits other than letters of credit shall be valued at an amount not to exceed market value less applicable haircuts as set forth in SEC Rule 240.15c3-1. Warrants shall be valued at an amount not to exceed the market value of the commodities represented by the warrants less a deduction in the same amount as the inventory haircut specified in Commission Regulation 1.17(c)(5)(ii).

8G930.D. Acceptance of Positions

IRS Clearing Members may accept positions for an account provided sufficient performance bond is on deposit in the account or is forthcoming within a reasonable time.

For an account which has been subject to calls for performance bond for an unreasonable time, IRS Clearing Members may only accept positions that reduce the performance bond requirements of existing positions in the account.

Clearing members may not accept positions for an account that has been in debit an unreasonable time.

8G930.E. Calls for Performance Bond

1. IRS Clearing Members must issue calls for performance bond that would bring an account up to the initial performance bond requirement: a) when performance bond equity in an account initially falls below the maintenance performance bond requirement; and b) subsequently, when

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performance bond equity plus existing performance bond calls in an account is less than the maintenance performance bond requirement.

Such calls must be made within one business day after the occurrence of the event giving rise to the call. IRS Clearing members may call for additional performance bond at their discretion. Notwithstanding the foregoing, an IRS Clearing Member is not required to call for or collect performance bond for day trades.

2. IRS Clearing Members shall only reduce a call for performance bond through the receipt of performance bond deposits permitted under subsection C. of this rule. IRS Clearing Members may cancel a call for performance bond through: a) the receipt of performance bond deposits permitted under subsection C. of this rule only if such deposits equal or exceed the amount of the total performance bond call; or b) inter-day favorable market movements and/or the liquidation of positions only if performance bond equity in the account is equal to or greater than the initial performance bond requirement. IRS Clearing Members shall reduce an account holder's oldest outstanding performance bond call first.

3. IRS Clearing Members must maintain written records of all performance bond calls issued and satisfied in whole or in part.

8G930.F. Release of Excess Performance Bond

Subject to exceptions granted by Exchange staff, IRS Clearing Members may only release performance bond deposits from an account if such deposits are in excess of initial performance bond requirements.

8G930.G. Loans to Account Holders

IRS Clearing Members may not make loans to account holders to satisfy their performance bond requirements unless such loans are secured as defined in CFTC Regulation 1.17(c)(3). The proceeds of such loans must be treated in accordance with CFTC Regulation 1.30.

8G930.H. Aggregation of Accounts and Positions

IRS Clearing Members may aggregate and net positions in accounts under identical ownership within the same classifications of customer segregated, customer secured, customer sequestered and non-segregated for performance bond purposes. IRS Clearing Members may compute performance bond requirements on identically owned concurrent long and short positions on a net basis.

8G930.I. Liquidation of Accounts

If an account holder fails to comply with a performance bond call within a reasonable time (the IRS Clearing Member may deem one hour to be a reasonable time), the IRS Clearing Member may close out the account holder's trades or sufficient contracts thereof to restore the account holder's account to required performance bond status. IRS Clearing Members shall maintain full discretion to determine when and under what circumstances positions in any account shall be liquidated.

8G930.J. Clearing House Authority to Require Additional IRS Performance Bond

The Clearing House, in its sole discretion, has the authority to require IRS Clearing Members to collect additional performance bond from specific account holders in circumstances deemed necessary by the Clearing House.

8G931-974. [RESERVED]

8G975. IRS EMERGENCY FINANCIAL CONDITIONS

If the Global Head of Clearing determines that the financial or operational condition of an IRS Clearing Member or one of its Affiliates is such that to allow that IRS Clearing Member to continue its operation would jeopardize the integrity of the Exchange, or negatively impacts the financial markets by introducing an unacceptable level of uncertainty, volatility or risk, whether or not the IRS Clearing Member continues to meet the required minimum financial requirements, they may empanel the Chief Executive Officer, Chairman of the Board, Chairman of the IRS Risk Committee, Chairman of the Clearing House Oversight Committee, and the Global Head of Clearing or their respective designees (the “IRS Emergency Financial Committee”). Such committee shall be duly authorized and, upon a unanimous vote of the panel, be empowered to order (a) an immediate position limitation, (b) an immediate suspension of the IRS Clearing Member, (c) that all open trades of said clearing member be for liquidation only, (d) the liquidation or transfer of all or a portion of the open positions of the clearing member, (e) additional performance bond to be deposited with the Clearing House and/or (f) any other action necessary to protect the financial

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integrity of the Clearing House. The IRS Clearing Member affected by action taken shall be notified and may request a hearing before the Board as provided in Rule 412. To the extent that the IRS Emergency Financial Committee orders that all open trades of a clearing member be for liquidation only, or the panel orders the liquidation or transfer of all of the open positions of an IRS Clearing Member, Rule 8G913.B. shall apply and the clearing member shall be treated as a withdrawing clearing member.

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CHAPTER 9
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Chapter 9
Clearing Members

GENERAL

900. CATEGORIES OF CLEARING MEMBERS

The Exchange may establish different clearing member categories, including but not limited to OTC Clearing Member categories, and alter the rights and responsibilities of such categories.

900.A. CME Clearing Members

CME Clearing Members shall have all applicable rights, responsibilities and privileges attendant thereto, subject to the provisions of these rules and shall be qualified to clear transactions for all CME products and all Expanded-Access Products listed for trading by CBOT after July 12, 2007.

CME Clearing Members receive fees in conjunction with CME Rule 106.H. Trading Member Firms. CME Clearing Members with shares are those clearing members that maintain CME Group Class A shares in accordance with CME Rule 106.J. Equity Member Firm requirements in order to receive equity member rates.

900.B. Financial Instrument Clearing Members

A Financial Instrument Clearing Member ("FICM") shall have the right to clear, for its own account, trades in certain CME and CBOT interest rate products executed in connection with a cash versus futures trading strategy.

The FICM must be guaranteed by a CME and/or CBOT Clearing Member that is entitled to clear all of the products cleared by the FICM. The guarantor must be the clearing member for the FICM's transactions in U.S. Treasury Securities and report to the Clearing House, at appropriate intervals, the FICM's open positions in U.S. Treasury Securities. The guarantor shall assume complete responsibility for all of the FICM's obligations to the Exchange and Clearing House arising from its operations as a FICM. In the event of a default by the FICM to the Clearing House in respect of any futures or options on futures, the FICM shall be suspended by the Exchange and the open positions of the FICM shall be transferred to, owned by, and become the direct responsibility of the guarantor. In the event of a default by the FICM or a related entity to the guarantor clearing firm, the Exchange will, at the request of the guarantor clearing firm, and upon due verification of the facts, facilitate the suspension of the FICM, in which case the open positions of the FICM shall be transferred to, owned by, and become the direct responsibility of the guarantor.

The FICM shall be subject to applicable CME and CBOT Rules, including those contained in CME and CBOT Rules Chapter 8 and Chapter 9, and including without limitation, CME Rule 802 (Protection of the Clearing House, including the primary responsibility for the Clearing House assessment obligation therein). The FICM shall comply with all of the requirements and obligations of a clearing member pursuant to CME Rule 901 (General Requirements and Obligations) with the exception of the parent guarantee requirement pursuant to CME 901(L).

The FICM must satisfy the following requirements:

(i) Adjusted Net Capital of $500,000;

(ii) Initial minimum guaranty fund deposit of $50,000 to be increased to reflect transaction volume, open interest and risk;

(iii) The assignment of one Full or two Associate Memberships for the privilege of clearing CBOT interest rate products and two CME, two IMM, two IOM, and one GEM membership for the privilege of clearing CME interest rate products. Memberships may be independently assigned.

FICMs receive fees in conjunction with CME and/or CBOT Rule 106.H. Trading Member Firms as applicable. FICMs that maintain CME Group Class A shares in accordance with CME Rule 106.J. Equity Member Firm requirements are eligible to receive equity member rates.

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(iv) The applicant shall be engaged in or demonstrate immediate capacity to engage in U.S. Treasury/interest rate futures spread trades and in order to maintain the status of a FICM, shall actively execute both sides of U.S. Treasury/interest rate futures spread trades.

A FICM applicant shall execute and place on file with the Exchange the following documents:

(i) An application for the FICM clearing membership;

(ii) Globex System access documentation;

(iii) Settlement bank account documents to permit the Clearing House to collect and disperse monies directly to the FICM;

(iv) An acknowledgement from the guarantor that it agrees to guarantee the performance and financial obligations of the FICM to the Clearing House for certain identified interest rate products;

(v) Authorization to the Clearing House to verify, at its discretion, the transactions and open positions of the FICM in U.S. Treasury Securities;

(vi) Authorization to the Clearing House to deliver the FICM's trade register and recap ledger to the FICM's Clearing Member guarantor;

(vii) A Clearing Member and FICM authorization pursuant to which the Clearing Member/guarantor will be authorized to submit complete and accurate transaction and position information respecting the U.S Treasury Securities of the FICM to the Clearing House; and

(viii) Any additional documents or information requested by the Clearing House for risk management purposes.

Exchange staff may grant exceptions to the requirements of Rule 900.B. for good cause if it is determined that such exceptions will not jeopardize the financial integrity of the Exchange.

901. GENERAL REQUIREMENTS AND OBLIGATIONS

Membership in the Clearing House is a privilege and license granted by the Board and may be withdrawn by the Board for cause at any time. Clearing House staff may grant exemptions to the General Requirements and Obligations set forth below for Clearing Members if it is determined that such an exemption will not jeopardize the financial integrity of the Clearing House. Subject to such exemptions, each applicant for qualification as a clearing member must satisfy the following requirements:

A. It shall be a corporation (defined by the Rules of the Exchange to include a limited liability company), partnership or other entity approved by Exchange staff. It shall agree to: 1) abide by all Exchange Rules and to cooperate in their enforcement; 2) be responsible, even after it has withdrawn as a clearing member, for any violations of Exchange Rules committed by it while it was a clearing member; and 3) continue to meet all requirements applicable to clearing members, including all financial requirements provided by these rules;

B. It shall have an authorized representative (i.e., officer, principal, or partner) who shall represent the clearing member before the Exchange and its committees. Such authorized representative shall be responsible to the Exchange for any representations made to the Exchange as if such person were a member as defined by Rule 400.

C. It shall be qualified to do business in the State of Illinois or the State of New York or have a valid agency agreement with an entity qualified to do business in the State of Illinois or the State of New York;[1]

D. It shall be engaged in or demonstrate immediate capacity to engage in the conduct of the business of a clearing member;

E. It shall demonstrate such fiscal and moral integrity as would justify the Clearing House's assumption of the risks inherent in clearing its trades;

F. It shall demonstrate financial capitalization commensurate with Exchange requirements as set by the Clearing House Risk Committee;

G. If any person directly or indirectly controls, owns 10% or more of, or has the right to 10% or more of the profits of two or more clearing members, then each such clearing member shall guarantee the obligations of the others to the Clearing House and shall execute a written guarantee to the Clearing

[1] Revised December 2008.

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House on a form approved by the Clearing House.

H. It shall notify the Exchange prior to any significant business transaction or significant change in operations which shall include, but is not limited to the following:

1. The merger, combination or consolidation between the clearing member and another person or entity;
2. The assumption or guarantee by the clearing member of all or substantially all of the liabilities of another in connection with a direct or indirect acquisition of all or substantially all of that person's or entity's assets;
3. The sale by the clearing member of a significant part of its business and/or assets to another person or entity;
4. A change in the direct or indirect beneficial ownership of 20% or more of the clearing member;
5. Any change in the system provider used by the clearing member to process its trades; and
6. A significant increase in the number of members that a clearing member qualifies.

Additionally, a clearing member that qualifies members must provide fifteen days notice to the Exchange of any proposal to terminate such business or any material part of such business.

The relevant committee or Exchange staff, upon such notice, may disapprove or approve, subject to certain conditions, such changes in structure or operations if it determines that the proposed change could jeopardize the financial or operational integrity of the Exchange or the Clearing House. For purposes of this Rule, the Clearing House Oversight Committee shall be the relevant committee with respect to corporate organization and structure changes and the Clearing House Risk Committee shall be the relevant committee with respect to all other changes.

I. It shall agree to guarantee and assume complete responsibility for the financial obligations attendant to: 1) all trades and orders executed or accepted for execution by a member it qualifies, including trades and orders executed, or which such member fails to execute, negligently, fraudulently or in violation of Exchange rules; 2) an unpaid arbitration award issued by a panel of the Arbitration Committee against a member it qualifies in circumstances where the dispute is related to a matter described in number 1) above; 3) an unpaid restitution order issued against a member it qualifies by a panel of the Business Conduct Committee, or a hearing panel of the Board of Directors; and 4) unpaid Exchange disciplinary fines imposed upon a member it qualifies if the member is also an employee of the clearing member or its affiliate, subject to a determination by the sanctioning entity.

J. It shall notify the Financial and Regulatory Surveillance Department in a timely manner of any material change in key personnel who are responsible to act on behalf of the clearing member.

K. [Reserved]

L. [Reserved]

M. It shall guarantee and assume financial responsibility for all trading activity routed through a Globex portal, or routed through any other electronic trading system to CME for clearing of such transactions. Such activity is guaranteed to CME by the clearing member via any connection, terminal, link, telecommunications hub or handheld unit provided by the clearing member to a third party as well as any other applicable electronic trading systems and terminals that the clearing member provides to a third party to enter orders.

N. It shall be responsible for the acts of Globex terminal operators accessing the Globex system through its connections, including direct connections or other connections that it provides to firms that are under common ownership with it. It shall be the duty of the clearing member to supervise its employees and agents acting as Globex terminal operators to ensure such employees and agents comply with Exchange rules, and any violation of Exchange rules by such terminal operators shall be considered a violation by the clearing member.

O. It shall agree to guarantee and assume complete responsibility for trades executed on Marketplaces for which the Exchange provides clearing services.

P. Each clearing member shall use systems and appropriate procedures to track accurately, and to provide to the Clearing House accurately, the positions and collateral of each of the cleared swaps customers.

Q. Requirement to Establish Uncommitted Repo. Each clearing member that is a U.S. Government

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Securities Broker-Dealer or has a U.S. Government Securities Broker-Dealer affiliate shall enter into (or arrange for such affiliate, or an affiliate that is a bank, to enter into) a master repurchase agreement with CME on terms substantially similar to those set out by the Clearing House. Each clearing member that has entered into such master repurchase agreement shall (or shall cause its affiliate that has entered into such master repurchase agreement to) periodically test repurchase transactions with the Clearing House when requested by the Clearing House.

R. Reserved

S. The obligation of a clearing member to pay settlement variation during each settlement cycle is satisfied when all required cash is credited as a settlement variation payment into the correct CME bank account at the relevant settlement bank. The obligation of a clearing member to post performance bond during each settlement cycle is satisfied when all required assets are deposited as performance bond into the correct CME bank account at the relevant custodial bank.

T. To clear transactions in futures or options on futures executed on or subject to the rules of a foreign board of trade identified in Rule 8C04, the applicant must meet any other conditions that the Clearing House may require.

902. CLEARING MEMBERSHIP ASSIGNMENT REQUIREMENTS

902.A. Assignment Requirement

Subject to exemptions granted by Exchange staff, each CME clearing member shall have at least: two CME memberships, two IMM memberships, two IOM memberships and one GEM membership assigned to the Clearing House. A clearing member which was an IMM Class A clearing member on or prior to May 6, 1987, shall have at least one CME membership, three IMM memberships, two IOM memberships and one GEM membership assigned to the Clearing House. A higher Division membership may be substituted for a lower Division membership to satisfy these requirements.

At least one CME, one IMM, one IOM and one GEM membership required for clearing membership pursuant to this Rule must be owned by the clearing member or a person, including a parent company, with an acceptable proprietary interest in such clearing member. One CME, one IMM, and one IOM membership required for clearing membership may be independently assigned.

Upon default of a clearing member in meeting its obligations to the Clearing House or upon the Clearing House Risk Committee's determination that a clearing member's financial position jeopardizes the financial integrity of the Clearing House, the Clearing House may direct the sale of any or all of the clearing member's assigned CME memberships. The proceeds from the sale of the CME memberships shall be used to satisfy Rule 110 obligations.

902.B. [Reserved]

902.C. Assignment Process

A membership may be assigned upon the completion of an Exchange-approved form. A membership may be assigned on behalf of only one clearing member and may not be subject to any Rule 110 claims at the time of assignment. Upon submitting an assignment form to the Membership Services Department, the membership shall be notified of the assignment. Parties will have ten days after the notification of the assignment to submit any Rule 110 claims against the membership being assigned. After all Rule 110 claims have been resolved to the satisfaction of the Exchange, the membership shall be assigned.

902.D. Assignment Substitutions

A clearing member may substitute a membership for an assigned membership provided that the clearing member continues to meet the assignment requirements of this Rule.

In the event a clearing member has a valid claim against a member that it qualifies and the member's membership is assigned to another clearing member, the clearing member utilizing the membership for assignment shall have 10 business days to substitute another membership to fulfill the assignment requirements of this Rule.

902.E. Assignment Withdrawal Disputes

In the event a member wants to withdraw their assigned membership over the objection of the clearing member to which the membership is assigned, such member must request permission to do so from Clearing House staff. The request must be in writing with a copy delivered to the clearing member to

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which the membership is assigned.

902.F. Lien on Memberships

Each clearing member hereby grants to the Clearing House a first priority and unencumbered lien against all memberships required for clearing membership by the Exchange.

903. RESPONSIBILITY FOR QUALIFIED MEMBERS

A. A clearing member that qualifies a member thereby guarantees and assumes complete responsibility for the financial obligations attendant to: 1) all trades and orders executed or accepted for execution by such member, including trades or orders executed, or which such member fails to execute, negligently, fraudulently or in violation of Exchange rules; 2) an unpaid arbitration award issued by a panel of the Arbitration Committee against such member in circumstances where the dispute is related to a matter described in number 1) above; 3) an unpaid restitution order issued against such member by a panel of the Business Conduct Committee, or a hearing panel of the Board of Directors; and 4) unpaid Exchange disciplinary fines imposed upon such member if the member is also an employee of the clearing member or its affiliate, subject to a determination by the sanctioning entity.

B. To qualify traders, a clearing member must have established systems in place for trade submission, clearing, and settlement/banking with the Clearing House.

C. No member may be qualified by more than one clearing member at one time.

D. A member may not transfer their qualification unless they have obtained a written release from the clearing member last qualifying them. A release shall not be withheld unless a member has an unsatisfied indebtedness to the clearing member last qualifying them where the indebtedness is due to a deficit arising from transactions on the Exchange or where the clearing member last qualifying them is the guarantor under an existing valid guarantee of a loan which had been made to the member exclusively for the purpose of financing the purchase of the member's membership. A member who believes their qualifying clearing member is unreasonably withholding a release necessary to permit the member to be qualified by a different clearing member may request a hearing before a Panel of the Business Conduct Committee as provided in Rule 511. Any other disputes between the parties shall be resolved, to the extent permitted by the rules, through the arbitration procedures set forth in Chapter 6.

E. A clearing member may, without prior notice, revoke a member's authorization to trade by written revocation filed with the Shareholder Relations and Membership Services Department. Such revocation shall be effective and the member's qualification to trade shall terminate when notice of the disqualification is posted on the Exchange floor. A member shall not appear upon the floor of the Exchange until they have been requalified.

F. A member shall place all trades, including trades for their own account or any account which they control, on the books of their qualifying clearing member unless written authorization to the contrary from said clearing member has been filed with the Shareholder Relations and Membership Services Department. Regardless of such authorization, a member in a deficit position with any clearing member shall place trades only through their qualifying clearing member. Any non-qualifying clearing member that carries a member's account in a deficit position shall promptly notify the clearing member that is qualifying such member.

G. No clearing member shall provide Globex access to, or clear any trade for, an employee, qualified trader or other representative of another clearing member without the written consent of such clearing member. No clearing member shall provide Globex access to, or clear any trade for, a person in a partnership with another clearing member without the written consent of all partners. Such written consent shall be filed with the Shareholder Relations and Membership Services Department.

H. In the case of a member who has Globex access guaranteed by a clearing member other than their qualifying clearing member, the qualifying clearing member may terminate the member's ability to place orders through Globex by notifying the clearing member providing the member access to Globex. The clearing member providing the access to Globex will be responsible for ensuring that the member does not place orders through Globex.

904. FUNDS IN TRADING ACCOUNTS CARRIED BY CLEARING MEMBERS

If a Member (as defined in Rule 400) trades in excess of written limits prescribed by their qualifying or guaranteeing clearing member or a clearing member through which such Member is authorized by

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their qualifying clearing member to trade pursuant to Rule 511 without sufficient funds in their account to margin the position, or if the Member is alleged to have engaged in reckless and unbusinesslike dealing inconsistent with just and equitable principles of trade, and such trades are profitable, the disposition of any and all funds in the applicable trading account(s) may be suspended by the carrying clearing member. The claim of a carrying clearing member to such profits shall be submitted to arbitration pursuant to the provisions of Chapter 6. The Member may request a hearing to be held as soon as practicable before a Chairman of the Arbitration Committee to determine the amount of any profits that should remain subject to a continued suspension pending an arbitration hearing on the full merits of the claim.

905. CHOICE OF LAW

(a) THE RULES OF THE EXCHANGE SHALL BE GOVERNED BY AND CONSTRUED IN ACCORDANCE WITH THE LAWS OF THE STATE OF ILLINOIS, WITHOUT GIVING EFFECT TO ITS CONFLICT-OF-LAW PRINCIPLES. EXCEPT AS OTHERWISE PROVIDED IN CHAPTERS 4, 5 AND 6 OF THE RULEBOOK, ANY ACTION, CLAIM, DISPUTE OR LITIGATION OF ANY KIND BETWEEN THE CLEARING MEMBER AND THE EXCHANGE ARISING FROM THE CLEARING MEMBER'S MEMBERSHIP IN THE EXCHANGE SHALL BE ADJUCIDATED IN A FEDERAL OR STATE COURT IN CHICAGO, ILLINOIS. CLEARING MEMBERS CONSENT TO THE JURISDICTION OF SUCH COURT AND TO SERVICE OF PROCESS BY ANY MEANS AUTHORIZED BY ILLINOIS OR U.S. FEDERAL LAW, AND SHALL NOT SEEK TO TRANSFER THE VENUE OF SUCH LITIGATION.

(b) EACH CLEARING MEMBER IRREVOCABLY WAIVES, WITH RESPECT TO ITSELF AND ITS REVENUES AND ASSETS, ANY IMMUNITY ON THE GROUND OF SOVEREIGNTY OR OTHER SIMILAR GROUNDS FROM SUIT, JURISDICTION OF ANY COURT, INJUNCTIVE RELIEF, ORDER FOR SPECIFIC PERFORMANCE OR FOR RECOVERY OF PROPERTY, ATTACHMENT OF ASSETS, AND EXECUTION OR ENFORCEMENT OF ANY JUDGMENT TO WHICH IT OR ITS REVENUES OR ASSETS MIGHT OTHERWISE BE ENTITLED IN ANY PROCEEDINGS IN THE COURTS OF ANY JURISDICTION, AND IRREVOCABLY AGREES THAT IT WILL NOT CLAIM ANY SUCH IMMUNITY IN ANY PROCEEDINGS.

906-909. [RESERVED]

APPLICATION PROCEDURES FOR CLEARING MEMBERS

910. APPLICATION FORMS

Applicants for clearing membership shall submit an application, financial statements and other documentation as Clearing House staff shall require.

911. SCREENING PROCEDURES

Upon receipt of an application, the Financial and Regulatory Surveillance Department and Clearing House Staff shall investigate the applicant's qualifications, which may include an examination of the books and records of the applicant.

912. APPROVAL

An applicant for clearing membership receiving a majority vote of the Clearing House Oversight Committee shall be approved effective immediately.

An applicant that fails to receive a majority vote shall be informed by the Clearing House Oversight Committee chairman and shall have 10 days thereafter to file an appeal to the Board seeking further consideration. The Board may approve the applicant by a majority vote if it is satisfied that the Clearing House Oversight Committee's decision was arbitrary, capricious or an abuse of the Clearing House Oversight Committee's discretion.

913. WITHDRAWAL FROM CLEARING MEMBERSHIP

913.A. Voluntary Withdrawal

A clearing member that intends to withdraw from clearing membership for Base Guaranty Fund Products shall provide written notice of such intent to the Clearing House and the Clearing House Oversight Committee. A clearing member's withdrawal shall be effective on the earlier of (i) the date Clearing House Staff approves such withdrawal or (ii) the 10th Business Day following the date of the clearing cycle in

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which the withdrawing clearing member liquidates or transfers to an appropriate clearing member all of its open customer and house positions in Base Guaranty Fund Products (such earlier date, the "Base Withdrawal Date"); provided that the withdrawing clearing member shall remain liable for Base Guaranty Fund contributions and assessments in accordance with Rule 913.B. Promptly following the Base Withdrawal Date, the Clearing House shall post a notice of the clearing member's withdrawal.

913.B. Release of Guaranty Fund Deposit, Membership Proceeds and Assignments

When a clearing member withdraws from clearing membership for Base Guaranty Fund Products (whether voluntarily or involuntarily), its Base Guaranty Fund deposit, the proceeds from the sale of its memberships assigned for clearing qualification or any other deposits required by the Clearing House, and any remaining assets available to the Clearing House associated with Base Guaranty Fund Products including, but not limited to, memberships will be released when Clearing House staff determines that the following has occurred: (1) all contracts and obligations with the Exchange have been settled and paid, (2) all sums owing to the Exchange have been paid, (3) all obligations to other members and customers arising out of claims directly related to Base Guaranty Fund Products cleared on the Exchange have been paid or otherwise provided for, (4) all obligations to other members and customers arising out of other arbitration claims for Base Guaranty Fund Products filed pursuant to Chapter 6 have been paid or otherwise provided for and (5) the requisite liquidity providers for the Exchange have released the security interest in such clearing member's "assets" associated with the clearing of Base Guaranty Fund Products in accordance with the terms of the liquidity facility described in Rule 817; provided, however, that in the event that Exchange staff determines that all of the foregoing other than (4) have occurred, the Clearing House Risk Committee may in its discretion authorize the release of such property.

Generally, no such property shall be released prior to the 60th day following the posting of the notice of the clearing member's withdrawal. Notwithstanding the above, Clearing House staff may grant an exemption to the above restriction for good cause shown. Further, for purposes of the paragraph above, if the withdrawing clearing member will not remain a clearing member in any other capacity with the Exchange, all obligations of the withdrawing clearing member to the Exchange, of whatever nature or kind, shall be accelerated and become due and payable upon the effective date of withdrawal. If the clearing member will remain a clearing member for other product classes other than Base Guaranty Fund Products, the foregoing sentence shall apply only to obligations related to the clearing of Base Guaranty Fund Products.

For purposes of Rules 802 and 816, the Base Guaranty Fund contributions and assessments of a non-defaulted clearing member that has withdrawn shall not be accessible by the Clearing House to satisfy any losses in respect of the default of another clearing member where such default occurred after the Base Cooling Off Period as of which the withdrawing clearing member had liquidated or transferred all of its open customer and house positions in Base Guaranty Fund Products. For the avoidance of doubt, a withdrawing clearing member shall be subject to assessments for all defaults occurring during the Base Cooling Off Period in which such clearing member withdraws.

914. BASE CLEARING MEMBER DEFAULT OBLIGATIONS

The Clearing House will establish Base Product Categories in order to establish a minimum number of capable bidders for such product category during a default. The Clearing House shall determine, in accordance with the Base Default Management Guidelines, the Base Product Categories for which Base Clearing Members are deemed to be Mandated Base Clearing Members, and publish such Base Product Categories.

A Base Clearing Member with open interest in its proprietary account for a Base Product Category, as determined by the Clearing House in accordance with the Base Default Management Guidelines, may be selected for mandatory participation in default drill exercises and default auctions based on the Clearing House's assessment of the following factors:

A. Relative amount of performance bond in the proprietary account for the relevant Base Product Category.

B. Relative intraday trading volume in the proprietary account for the relevant Base Product Category.

C. An assessment of the firm's capabilities for participating in default drill exercises or default auctions.

The Clearing House may, in its sole discretion, exempt a Mandated Base Clearing Member from mandatory participation in Base default drill exercises and default auctions based on any of the factors above, including the significance of the firm's open interest. No Mandated Base Clearing Member or

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Bidding OTC Firm will be required to participate in a default auction where the Clearing House determines that such firm's open interest in a Base Product Category or OTC Derivatives Product Category, as applicable, is not proportional to the size of the defaulted Base Clearing Member's positions in the same products.

Each Mandated Base Clearing Member must satisfy the requirements set forth below:

1. Comply with all Clearing House default management requirements and associated responsibilities and obligations. A Mandated Base Clearing Member may contract with a third party (including an affiliate) to fulfill certain default management requirements; provided that, the Mandated Base Clearing Member first notifies the Clearing House, which reserves the right to review and approve such arrangements prior to them taking effect. Notwithstanding the existence of a third-party arrangement, each Mandated Base Clearing Member shall be liable for any failure to comply with a Clearing House requirement for default drill exercises or default auctions.

2. Participate in each hedging or liquidation auction conducted by the Clearing House for a defaulted Base Clearing Member's Base Contracts (each, a "Base Default Management Auction"), as required by the Clearing House, in every Base Product Category for which it is a Mandated Base Clearing Member and has open interest in the relevant Base Product Category in its proprietary account. Each Mandated Base Participant shall participate in Base default drill exercises as prescribed by the Clearing House. Each Mandated Base Clearing Member shall have the ability to provide quotations to the Clearing House for hedging and liquidation transactions for each Base Product Category for which it is a Mandated Base Clearing Member. The Base Guaranty Fund contribution of a Base Clearing Member that participates in a Base Default Management Auction or fails to meet its participation requirement for such auction shall be allocated in accordance with CME Group Exchange Rule 802.B.

3. Notify the Clearing House of any change to its trading capabilities that may impact its ability to participate in default drill exercises or default auctions in any Base Product Category for which it is a Mandated Base Clearing Member.

915. LIQUIDITY POLLS

The Clearing House will establish categories and sub-categories of Base Contracts for mandatory participation in liquidity polling processes ("Liquidity Polling Categories") in order to establish a minimum number of mandatory participants in liquidity polls and to assist with estimating the cost of liquidating a hypothetical portfolio of a defaulted Base Clearing Member (each, a "Liquidity Poll"). The Clearing House shall determine the Liquidity Polling Categories for which Base Clearing Member are required to participate in Liquidity Polls and publish such Liquidity Polling Categories.

A Base Clearing Member with open interest in its proprietary account for a Liquidity Polling Category may be selected for mandatory participation in Liquidity Polls based on the Clearing House's assessment of the following factors:

A. Relative performance bond in the proprietary account for the relevant Liquidity Polling Category.

B. Relative intraday trading volume for the proprietary account for the relevant Liquidity Polling Category.

C. An assessment of the firm's capabilities for participating in Liquidity Polls.

The Clearing House may, in its sole discretion, exempt a Base Clearing Member from mandatory participation in the nearest Liquidity Poll for one or more Liquidity Polling Categories, based on the factors above or any other factor it deems relevant.

Each Base Clearing Member that is required to participate in a Liquidity Poll must comply with all Clearing House participation requirements for that Liquidity Poll. A Base Clearing Member's failure to provide required Liquidity Poll submissions by the deadline established by the Clearing House may result in the Base Clearing Member being assessed up to $50,000 and/or referral to the Chief Regulatory Officer for potential disciplinary action, in accordance with established CME Clearing procedures.

916. SUPPLEMENTAL TRADING HOURS

916.A. Approval and Hours

Subject to the approval by CME Clearing, Base Clearing Members shall be qualified to clear transactions for Base Contracts that clear on the next Business Day on such days and during such hours, as the Clearing House determines, for the purposes of this Rule 916, entitled, "Supplemental Trading Hours." Supplemental Trading Hours shall include, but are not limited to, the hours from 4:00 p.m. central time on

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Friday through 4:59 p.m. central time on Sunday, entitled, "Weekend Hours," and the hours, as the Clearing House determines for the purposes of this Rule 916, on the days that are impacted by amended trading hours for Exchange Holidays. Trades that are matched during Supplemental Trading Hours are novated to the Clearing House pursuant to Rule 804. The Clearing House will publish Supplemental Trading Hours for the days that are impacted by amended trading hours for Exchange Holidays.

916.B. Exposure Monitoring

The Clearing House will monitor each Base Clearing Member's exposure to the Clearing House during Supplemental Trading Hours. During certain hours within the Supplemental Trading Hours, entitled, "Advance Funding Hours," the Clearing House will monitor if a Base Clearing Member's exposure, as defined in Rules 916.B.1. and 916.B.2., exceeds, as applicable, its collateral and performance bond amounts posted to the Clearing House for the relevant account class and/or its available sources of liquidity, as the Clearing House determines. Advance Funding Hours shall include, but are not limited to, Weekend Hours and other hours that are within the Supplemental Trading Hours, as the Clearing House determines, for the purposes of this Rule 916. The Clearing House will publish the Advance Funding Hours for the hours that are not Weekend Hours.

1. Base Contracts that are Not Event Contract Swaps

During Advance Funding Hours, the Clearing House will monitor if a Base Clearing Member's: i) performance bond exposure, as the Clearing House determines, in Base Contracts excluding Event Contract Swaps exceeds its collateral and performance bond amounts posted to the Clearing House for the relevant account class; and ii) outstanding exposure, as defined in Rule 814, in Base Contracts excluding Event Contract Swaps exceeds its available sources of liquidity, as the Clearing House determines. If either exposure exceeds, as applicable, the Base Clearing Member's collateral and performance bond amounts posted to the Clearing House for the relevant account class or available sources of liquidity, as the Clearing House determines, the Clearing House may impose additional requirements on such Base Clearing Member to mitigate the risk prior to the next settlement cycle, including, but not limited to, position limitations.

2. Base Contracts that are Event Contract Swaps

During Advance Funding Hours, the Clearing House will monitor if a Base Clearing Member's exposure, as the Clearing House determines, in Base Contracts that are Event Contract Swaps exceeds its collateral and performance bond amounts posted to the Clearing House for the relevant account class. If such exposure exceeds the Base Clearing Member's collateral and performance bond amounts posted to the Clearing House for the relevant account class, the Clearing House may impose additional requirements on such Base Clearing Member to mitigate the risk prior to the next settlement cycle, including, but not limited to, position limitations.

916.C. Risk Management Policies and Procedures

1. Base Contracts that are Not Event Contract Swaps

In addition to its other obligations under the Rules, 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, as defined in Rule 814, 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 under the Rules, 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.

917.-929. [RESERVED]

ACCOUNT HOLDER PERFORMANCE BOND REQUIREMENTS

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930. PERFORMANCE BOND REQUIREMENTS: ACCOUNT HOLDER LEVEL

930.A. Performance Bond System

The Standard Portfolio Analysis of Risk ("SPAN®") Performance Bond System and SPAN 2 are the performance bond systems adopted by the Exchange. SPAN and SPAN 2-generated performance bond requirements shall constitute Exchange performance bond requirements. All references to performance bond within the rules of the Exchange shall relate to those computed by the SPAN or SPAN 2 systems, except for cleared over-the-counter ("OTC") foreign exchange ("FX") and interest rate swap ("IRS") transactions, where the Historical Value at Risk ("HVaR") Performance Bond System is used for cleared OTC FX and IRS transaction performance bonds.

Performance bond systems other than the SPAN and SPAN 2 systems may be used to meet Exchange performance bond requirements if the clearing member can demonstrate that its system will always produce a performance bond requirement equal to or greater than the SPAN and SPAN 2 performance bond requirements.

930.B. Performance Bond Rates

1. Non-Security Futures and OTC Derivatives

Exchange staff shall determine initial and maintenance performance bond rates used in determining Exchange performance bond requirements. The Board reserves the right to change or modify any performance bond levels determined by Exchange staff.

2. Security Futures

a. Initial and maintenance performance bond (or "margin") rates used in determining Exchange performance bond requirements applied to Security Futures on behalf of Customers, whether effected on the Exchange or on a Marketplace apart from Exchange but cleared by the Clearing House per Chapter 8B, and held in a futures account, shall be established at levels no lower than those prescribed by CFTC Regulation Section 41.45; and, SEC Regulation 242.403, including any successor Regulations.

b. As used in this Rule, the term "Customer" does not include (a) an "exempted person" as defined in CFTC Regulation 41.43(a)(9) and SEC Regulation 242.401(a)(9); or (b) Market Makers as defined below.

A Person shall be a "Market Maker" for purposes of this Rule, and shall be excluded from the requirements set forth in CFTC Regulations 41.42 through 41.49; and, SEC Regulations 242.400 through 242.406 in accordance with CFTC Regulation 41.42(c)(2)(v) and SEC Regulation 242.400(c)(2)(v), with respect to all trading in Security Futures for its own account, if such Person is an Exchange Member that is registered with the Exchange as a "Security Futures Dealer."

Each Market Maker shall: (a) be a member of the Exchange; or, be registered as a dealer with the SEC under Section 15(b) of the Exchange Act; (b) maintain records sufficient to prove compliance with the requirements set forth in this Rule and CFTC Regulation 41.42(c)(2)(v) and SEC Regulation 242.400(c)(2)(v), including without limitation, trading account statements and other financial records sufficient to detail activity and verify conformance with the standards set forth herein; and (c) hold itself out as being willing to buy and sell Security Futures for its own account on a regular or continuous basis.

A Market Maker satisfies condition (c) above if, at a minimum, any of the following three requirements are fulfilled:

(1) The Market Maker:

(i) Provides continuous two-sided quotations throughout the trading day for all delivery months of Security Futures Contracts representing a meaningful proportion of the total trading volume of Security Futures Contracts on the Exchange, subject to relaxation during unusual market conditions as determined by the Exchange (such as a fast market in either a Security Futures Contract or a security underlying a Security Futures Contract) at which times the Market Maker must use its best efforts to quote continuously and competitively; and

(ii) When providing quotations, quotes with a maximum bid/ask spread no more than the

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greater of $0.20 or 150% of the bid/ask spread in the primary market for the security underlying each Security Futures Contract.

(2) The Market Maker:

(i) Responds to at least 75% of the requests for quotation for all delivery months of Security Futures Contracts representing a meaningful proportion of the total trading volume of Security Futures Contracts on the Exchange, subject to relaxation during unusual market conditions as determined by the Exchange (such as a fast market in either a Security Futures Contract or a security underlying a Security Futures Contract) at which times the Market Maker must use its best efforts to quote competitively; and

(ii) When responding to requests for quotation, quotes within five seconds with a maximum bid/ask spread no more than the greater of $0.20 or 150% of the bid/ask spread in the primary market for the security underlying each Security Futures Contract.

(3) The Market Maker:

(i) Is assigned to a group of Security Futures Contracts listed on the Exchange that is either unlimited in nature ("Unlimited Assignment"); or, is assigned to no more that 20% of the Security Futures Contracts listed on the Exchange ("Limited Assignment");

(ii) At least 75% of the Market Maker's total trading activity in Exchange Security Futures Contracts is in its assigned Security Futures Contracts, measured on a quarterly basis;

(iii) During at least 50% of the trading day the Market Maker has bids or offers in the market that are at or near the best market, except in unusual market conditions as determined by the Exchange (such as a fast market in either a Security Futures Contract or a security underlying a Security Futures Contract), with respect to at least 25% (in the case of an Unlimited Assignment) or at least one (in the case of a Limited Assignment) of its assigned Security Futures Contracts; and

(iv) The requirements in (ii) and (iii) above are satisfied on: (a) at least 90% of the trading days in each calendar quarter by Market Makers who have undertaken an Unlimited Assignment; or (b) at least 80% of the trading days in each calendar quarter by Market Makers who have undertaken a Limited Assignment; or (c) on at least 80% of the trading days in each calendar quarter by Market Makers who have undertaken either an Unlimited Assignment or Limited Assignment but where the Exchange is listing four (4) or fewer Security Futures Contracts.

For purposes of clauses (1) and (2) above, beginning on the 181st calendar day after the commencement of trading of Security Futures Contracts on the Exchange, a "meaningful proportion of the total trading volume of Security Futures Contracts on the Exchange" shall mean a minimum of 20% of such trading volume.

Any Market Maker that fails to comply with the applicable Rules of the Exchange, CFTC Regulations 41.41 through 41.49 and SEC Regulations 242.400 through 242.406 shall be subject to disciplinary action in accordance with Chapter 4. Appropriate sanctions in the case of any such failure shall include, without limitation, a revocation of such Market Maker's registration as a Security Futures Dealer.

c. The Exchange shall establish initial and maintenance performance bond requirements applicable to Security Futures and held in a futures account, provided that the performance bond requirement for any long or short position held by a clearing member on behalf of a Customer shall not be less than 20% of the current market value of the relevant Contract; or, such other requirement as may be established by the CFTC and SEC for purposes of CFTC Regulation 41.45(b)(1) and SEC Regulation 242.403(b)(1) except as provided below.

d. Initial and maintenance performance bond requirements for offsetting positions involving Security Futures and related positions are provided in the schedule below, for purposes of CFTC Regulation 41.45(b)(2) and SEC Regulation 242.403(b)(2).

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PERFORMANCE BOND (or "MARGIN") REQUIREMENTS FOR OFFSETTING POSITIONS

DESCRIPTION OF OFFSET	SECURITY UNDERLYING THE SECURITY FUTURE	INITIAL MARGIN REQUIREMENT	MAINTENANCE MARGIN REQUIREMENT
Long security future (or basket of security futures representing each component of a narrow-based securities index) and long put option on the same underlying security (or index)	Individual stock or narrow-based security index	20% of the current market value of the long security future, plus pay for the long put in full.	The lower of: (1) 10% of the aggregate exercise price of the put plus the aggregate put out-of-the-money amount, if any; or (2) 20% of the current market value of the long security future.
Short security future (or basket of security futures representing each component of a narrow-based securities index) and short put option on the same underlying security (or index)	Individual stock or narrow-based security index	20% of the current market value of the short security future, plus the aggregate put in-the-money amount, if any. Proceeds from the put sale may be applied.	20% of the current market value of the short security future, plus the aggregate put in-the-money amount, if any.
Long security future and short position in the same security (or securities basket) underlying the security future	Individual stock or narrow-based security index	The initial margin required under Regulation T for the short stock or stocks.	5% of the current market value as defined in Regulation T of the stock or stocks underlying the security future.
Long security future (or basket of security futures representing each component of a narrow-based securities index) and short call option on the same underlying security (or index)	Individual stock or narrow-based security index	20% of the current market value of the long security future, plus the aggregate call in-the-money amount, if any. Proceeds from the call sale may be applied.	20% of the current market value of the long security future, plus the aggregate call in-the-money amount, if any.
Long a basket of narrow-based security futures that together tracks a broad-based index and short a broad-based security index call option contract on the same index	Narrow-based security index	20% of the current market value of the long basket of narrow-based security futures, plus the aggregate call in-the-money amount, if any. Proceeds from the call sale may be applied.	20% of the current market value of the long basket of narrow-based security futures, plus the aggregate call in-the-money amount, if any.

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DESCRIPTION OF OFFSET	SECURITY UNDERLYING THE SECURITY FUTURE	INITIAL MARGIN REQUIREMENT	MAINTENANCE MARGIN REQUIREMENT
Short a basket of narrow-based security futures that together tracks a broad-based security index and short a broad-based security index put option contract on the same index	Narrow-based security index	20% of the current market value of the short basket of narrow-based security futures, plus the aggregate put in-the-money amount, if any. Proceeds from the put sale may be applied.	20% of the current market value of the short basket of narrow-based security futures, plus the aggregate put in-the-money amount, if any.
Long a basket of narrow-based security futures that together tracks a broad-based security index and long a broad-based security index put option contract on the same index	Narrow-based security index	20% of the current market value of the long basket of narrow-based security futures, plus pay for the long put in full.	The lower of: (1) 10% of the aggregate exercise price of the put, plus the aggregate put out-of-the-money amount, if any; or (2) 20% of the current market value of the long basket of security futures.
Short a basket of narrow-based security futures that together tracks a broad-based security index and long a broad-based security index call option contract on the same index	Narrow-based security index	20% of the current market value of the short basket of narrow-based security futures, plus pay for the long call in full.	The lower of: (1) 10% of the aggregate exercise price of the call, plus the aggregate call out-of-the-money amount, if any; or (2) 20% of the current market value of the short basket of security futures.
Long security future and short security future on the same underlying security (or index)	Individual stock or narrow-based security index.	The greater of: 5% of the current market value of the long security future; or (2) 5% of the current market value of the short security future.	The greater of: 5% of the current market value of the long security future; or (2) 5% of the current market value of the short security future.
Long security future, long put option and short call option. The long security future, long put and short call must be on the same underlying security and the put and call must have the same exercise price. (Conversion)	Individual stock or narrow-based security index.	20% of the current market value of the long security future, plus the aggregate call in-the-money amount, if any, plus pay for the put in full. Proceeds from the call sale may be applied.	10% of the aggregate exercise price, plus the aggregate call in-the-money amount, if any.

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DESCRIPTION OF OFFSET	SECURITY UNDERLYING THE SECURITY FUTURE	INITIAL MARGIN REQUIREMENT	MAINTENANCE MARGIN REQUIREMENT
Long security future, long put option and short call option. The long security future, long put and short call must be on the same underlying security and the put exercise price must be below the call exercise price (Collar)	Individual stock or narrow-based security index.	20% of the current market value of the long security future, plus the aggregate call in-the-money amount, if any, plus pay for the put in full. Proceeds from call sale may be applied.	The lower of: (1) 10% of the aggregate exercise price of the put plus the aggregate put out-of-the money amount, if any; or (2) 20% of the aggregate exercise price of the call, plus the aggregate call in-the-money amount, if any.
Short security future and long position in the same security (or securities basket) underlying the security future	Individual stock or narrow-based security index.	The initial margin required under Regulation T for the long stock or stocks.	5% of the current market value, as defined in Regulation T, of the long stock or stocks.
Short security future and long position in a security immediately convertible into the same security underlying the security future, without restriction, including the payment of money	Individual stock or narrow-based security index.	The initial margin required under Regulation T for the long security.	10% of the current market value, as defined in Regulation T, of the long security.
Short security future (or basket of security futures representing each component of a narrow-based securities index) and long call option or warrant on the same underlying security (or index)	Individual stock or narrow-based security index.	20% of the current market value of the short security future, plus pay for the call in full.	The lower of: (1) 10% of the aggregate exercise price of the call, plus the aggregate call out-of-the-money amount, if any; or (2) 20% of the current market value of the short security future.
Short security future, Short put option and long call option. The short security future, short put and long call must be on the same underlying security and the put and call must have the same exercise price. (Reverse Conversion)	Individual stock or narrow-based security index.	20% of the current market value of the short security future, plus the aggregate put in-the-money amount, if any, plus pay for the call in full. Proceeds from put sale may be applied.	10% of the aggregate exercise price, plus the aggregate put in-the-money amount, if any.

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DESCRIPTION OF OFFSET	SECURITY UNDERLYING THE SECURITY FUTURE	INITIAL MARGIN REQUIREMENT	MAINTENANCE MARGIN REQUIREMENT
Long (short) a basket of security futures, each based on a narrow-based security index that together tracks the broad-based index and short (long) a broad-based index future	Narrow-based security index	5% of the current market value for the long (short) basket of security futures.	5% of the current market value of the long (short) basket of security futures.
Long (short) a basket of security futures that together tracks a narrow-based index and short (long) a narrow-based index future	Individual stock or narrow-based security index	The greater of: (1) 5% of the current market value of the long security future(s); or (2) 5% of the current market value of the short security future(s).	The greater of: (1) 5% of the current market value of the long security future(s); or (2) 5% of the current market value of the short security future(s).
Long (short) a security future and short (long) an identical security future traded on a different market.	Individual stock or narrow-based security index	The greater of: (1) 3% of the current market value of the long security future(s); or (2) 3% of the current market value of the short security future(s).	The greater of: (1) 3% of the current market value of the long security future(s); or (2) 3% of the current market value of the short security future(s).

930.C. Acceptable Performance Bond Deposits

1. Non-Security Futures and OTC Derivatives

Clearing members may accept from their account holders as performance bond cash currencies of any denomination, readily marketable securities (as defined by SEC Rule 15c3-1(c)(11) and applicable SEC interpretations), money market mutual funds allowable under CFTC Regulation 1.25, bank–issued letters of credit, fully collateralized pass-through letters of credit allowable under the Clearing House's collateral acceptance programs, warrants, warehouse receipts and shipping certificates that are registered as deliverable for commodities traded on Chicago Mercantile Exchange Inc., Chicago Board of Trade Inc., New York Mercantile Exchange, Inc. or Commodity Exchange, Inc., and "London Good Delivery" gold, as defined by the London Bullion Market Association.

Clearing members shall not accept as performance bond from an account holder securities that have been issued, sponsored or otherwise guaranteed by the account holder or an affiliate of the account holder unless the clearing member files a petition with and receives permission from Clearing House staff.

Unless permitted (either not restricted or specifically authorized) by the U.S. Department of Treasury's Office of Foreign Assets Control ("OFAC") and/or any Sanctioning Body, as applicable, Clearing members may not accept from their account holders as performance bond any debt or equity security issued by Sanctioned Parties as defined in Rule 543, assets in which Sanctioned Parties have an interest, or any other assets that are or would be subject to blocking restrictions or sectoral sanction restrictions imposed by the OFAC or are subject to similar restrictions imposed by another Sanctioning Body.

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Bank-issued letters of credit and fully collateralized pass through letters of credit must be in a form acceptable to the Clearing House. Such letters of credit must be drawable in the United States. Clearing members shall not accept as performance bond from an account holder letters of credit issued by the account holder, an affiliate of the account holder, the clearing member, or an affiliate of the clearing member.

All assets deposited by account holders to meet performance bond requirements must be and remain unencumbered by third party claims against the depositing account holder.

Except to the extent that Clearing House staff shall prescribe otherwise, cash currency performance bond deposits shall be valued at market value. All other performance bond deposits other than letters of credit, warrants, warehouse receipts and shipping certificates shall be valued at an amount not to exceed market value less applicable haircuts as set forth in SEC Rule 240.15c3-1. Warrants, warehouse receipts and shipping certificates shall be valued at an amount not to exceed the market value of the commodities represented by the warrants, warehouse receipts or shipping certificates, less a deduction in the same amount as the inventory haircut specified in Commission Regulation 1.17(c)(5)(ii).

2. Security Futures

   a. Clearing Members may accept from their Customers as performance bond (or "margin") for Security Futures held in a futures account, deposits of cash, margin securities (subject to the limitations set forth in the following sentence), exempted securities, any other assets permitted under Regulation T of the Board of Governors of the Federal Reserve System (as in effect from time to time) to satisfy a performance bond deficiency in a securities margin account, and any combination of the foregoing, each as valued in accordance with CFTC Regulations 41.46(c) and 41.46(e); and, SEC Regulations 242.404(c) and 242.404(e). Shares of a money market mutual fund that meet the requirements of CFTC Regulation 1.25 may be accepted as a performance bond deposit from a Customer for purposes of this Rule.

   b. A Clearing Member shall not accept as performance bond from any Customer securities that have been issued by such Customer or an Affiliate of such Customer unless such Clearing Member files a petition with and receives permission from the Exchange for such purpose.

   c. All assets deposited by a Customer to meet performance bond requirements must be and remain unencumbered by third party claims against the depositing Customer.

930.D. Acceptance of Orders

Except as provided for in compliance with Rule 930.N.,

1. Clearing members may accept orders for an account provided sufficient performance bond is on deposit in the account or is forthcoming within a reasonable time.
2. For an account which has been subject to calls for performance bond for an unreasonable time, clearing members may only accept orders that reduce the performance bond requirements of existing positions in the account.
3. Clearing members may not accept orders for an account that has been in debit an unreasonable time.

930.E. Calls for Performance Bond

Except as provided for in compliance with Rule 930.N.,

1. Clearing members must issue calls for performance bond that would bring an account up to the initial performance bond requirement: a) when performance bond equity in an account initially falls below the maintenance performance bond requirement; and b) subsequently, when performance bond equity plus existing performance bond calls in an account is less than the maintenance performance bond requirement.

Such calls must be made within one business day after the occurrence of the event giving rise to the call. Clearing members may call for additional performance bond at their discretion. Notwithstanding the foregoing, a clearing member is not required to call for or collect performance bond for day trades.

2. Clearing members shall only reduce a call for performance bond through the receipt of performance bond deposits permitted under subsection C. of this

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rule. Clearing members may cancel a call for performance bond through: a) the receipt of performance bond deposits permitted under subsection C. of this rule only if such deposits equal or exceed the amount of the total performance bond call; or b) inter-day favorable market movements and/or the liquidation of positions only if performance bond equity in the account is equal to or greater than the initial performance bond requirement. Clearing members shall reduce an account holder's oldest outstanding performance bond call first.

3. Clearing members must maintain written records of all performance bond calls issued and satisfied in whole or in part.

930.F. Release of Excess Performance Bond

Except as provided for in compliance with Rule 930.N., clearing members may only release performance bond deposits from an account if such deposits are in excess of initial performance bond requirements.

930.G. Loans to Account Holders

Clearing members may not make loans to account holders to satisfy their performance bond requirements unless such loans are secured as defined in CFTC Regulation 1.17(c)(3). The proceeds of such loans must be treated in accordance with CFTC Regulation 1.30.

930.H. Aggregation of Accounts and Positions[2]

Except as provided for in compliance with Rule 930.N., Clearing members may aggregate and net positions in accounts under identical ownership within the same classifications of customer segregated, customer secured, Cleared Swaps Customer, and nonsegregated for performance bond purposes. Clearing members may compute performance bond requirements on identically owned concurrent long and short positions on a net basis.

930.I. Risk Profile of Accounts

A Clearing Member must determine a risk profile for each account it carries, consistent with its risk management policies and procedures and the requirements of Rule 982.A.7, and collect performance bond in an amount commensurate with the account's risk profile. Each account that the Clearing Member determines to have a heightened risk profile shall be subject to initial performance bond requirements established by the Exchange. For each account that does not have a heightened risk profile the initial performance bond requirement shall equal the maintenance performance bond requirement established by the Exchange. A Clearing Member may call for additional performance bond at its discretion as set forth in this Rule.

930.J. Omnibus Accounts

1. Clearing members shall collect performance bond on a gross basis for positions held in domestic and foreign omnibus accounts including for positions of separate account customers as required under CFTC Regulation 1.58.

2. Clearing members shall obtain and maintain written instructions and/or documentation from domestic and foreign omnibus accounts for positions which are entitled to available performance bond offsets or credits.

930.K. Liquidation of Accounts

1. Non-Security Futures and OTC Derivatives

   If an account holder fails to comply with a performance bond call within a reasonable time (the clearing member may deem one hour to be a reasonable time), the clearing member may close out the account holder's trades or sufficient contracts thereof to restore the account holder's account to required performance bond status. Clearing members shall maintain full discretion to determine when and under what circumstances positions in any account shall be liquidated.

2. Security Futures

   If a Customer fails to comply with a performance bond (or "margin") call within a reasonable period of time (the clearing member may deem one hour to be a reasonable period of time), the relevant

[2] Revised October 2010.

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clearing member shall take the deduction required with respect to an undermargined account in computing its net capital under applicable CFTC and SEC Regulations.

If at any time there is a liquidating deficit in an account in which security futures are held, the clearing member shall take steps to liquidate positions in the account promptly and in an orderly manner.

930.L. Clearing House Authority to Require Additional Performance Bond

The Clearing House, in its sole discretion, has the authority to require clearing members to collect additional performance bond from specific account holders in circumstances deemed necessary by the Clearing House.

930.M. Failure to Maintain Performance Bond Requirements

If a clearing member fails to maintain performance bond requirements for an account in accordance with this rule, the Exchange or the Clearing House may direct such clearing member to immediately liquidate all or part of the account's positions to eliminate the deficiency.

930.N. Separate Account Margining

All clearing members providing separate account treatment in accordance with CFTC Regulation 1.44 must comply with all requirements set forth in CFTC Regulation 1.44.

931.-948. [RESERVED]

949. CREDIT CONTROLS

Clearing Members shall comply with all credit control policies developed by the Exchange for customer and proprietary transactions. Such credit control policies may include, but not be limited to, registration of credit control administrators with the Exchange, definition of credit control limits, and maintenance of written procedures verifying compliance with Exchange credit control requirements. For general reference purposes, credit control functionality that may be developed for Globex is a system or service pursuant to Rule 578. Any credit control functionality required by the Exchange shall be in addition to a clearing member's internal risk monitoring and credit control procedures.

SALES PRACTICES AND CUSTOMER PROTECTION

950. SUPERVISION

Each clearing member shall adopt and enforce written procedures pursuant to which it will supervise in accordance with the requirements of these Rules and the CEA and CFTC Regulations thereunder, each customer's account(s). For purposes of this rule, the term "customer" does not include another futures commission merchant.

951. DISCLOSURE REQUIREMENTS

Each clearing member must comply with all disclosure requirements set forth in applicable CFTC and NFA Rules and Regulations.

952. SALES COMMUNICATIONS

No clearing member shall make fraudulent or high-pressure sales communications relating to the offer or sale of commodity futures and options or make misleading communications in the conduct of its business activities.

953. PROMOTIONAL MATERIAL

No clearing member shall use any promotional material which is likely to deceive or mislead the public. Each clearing member shall maintain a copy of all written and electronic promotional material at the clearing member's principal place of business and shall make such promotional material available to the Exchange upon request.

954. CUSTOMER COMPLAINTS

Each clearing member shall retain all written customer complaints, and make and retain a record of the date each complaint was received, the associated person who serviced the account, a general description of the matter complained of, and what, if any, action was taken by the clearing member regarding the complaint. With respect to verbal complaints, each clearing member shall develop and implement a written program approved by senior management that requires clearing member staff to direct individuals with verbal complaints to place such complaints in written form and submit such complaints to the

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Compliance Officer of the clearing member. Such complaints and related records must be maintained at the clearing member's principal place of business.

955. ASSIGNMENT AND NOTIFICATION OF EXERCISE NOTICES

A. Each clearing member shall adopt written procedures pursuant to which it shall allocate option exercise notices in a fair and non-preferential manner.

B. Upon notification from the Clearing House of assignment of an exercise notice, the clearing member shall promptly notify the option grantor to whom the notice has been allocated.

956. DISCRETIONARY, CONTROLLED AND MANAGED ACCOUNTS

956.A. Requirements

1. Power of Attorney

   No clearing member shall accept or carry an account over which a person other than the account owner exercises discretionary trading authority or control (hereinafter referred to as a discretionary, controlled, or managed account) without first obtaining a written power of attorney, trading authorization, or similar document (hereinafter referred to as a power of attorney). Such power of attorney must be signed and dated by the account owner and clearly designate the person to whom discretionary trading authority has been granted.

2. Discretionary Account Listing

   A clearing member must clearly identify each discretionary trading account it carries and promptly provide the Exchange with a complete and accurate list of such accounts upon request.

956.B. Presumption of Authority

Except where specifically indicated by the phrase "discretion not exercised" written on the order ticket, and subsequently confirmed to the customer as such, every trade in a discretionary trading account shall be presumed to have been made pursuant to the power of attorney and subject to the requirements of this rule.

956.C. Supervision and Trading of Discretionary Trading Accounts

1. Discretionary Trading Account Activity

   Each clearing member shall have a supervisory employee (other than the person granted discretionary trading authority) supervising activity in discretionary trading accounts. The supervision shall include, but is not limited to, a review of excessive trading in amount or frequency in relation to account equity. This requirement shall only apply to discretionary trading accounts controlled by an employee of the clearing member or the clearing member's guaranteed introducing brokers.

2. Floor Trading

   No member shall execute a transaction in the trading pit for an account over which they have discretionary trading authority unless the transactions are for a) family accounts as defined in Section E.1. or b) another member of the Exchange for an account owned by such other member or proprietary accounts of member firms as set forth in Section E.2.

956.D. [RESERVED]

956.E. Exceptions

The provisions of Sections B. and C.1. of this rule shall not apply to the following accounts:

1. Family Accounts

   Accounts controlled or managed by persons for their own family. For purposes of this rule, members of one's family shall include a spouse, parent, child, grandparent, grandchild, brother, sister, aunt, uncle, nephew, niece or in-law.

2. Member and Proprietary Accounts

   Accounts of members or proprietary accounts as defined by CFTC Regulation 1.3(y).

957. CONFIRMATIONS TO CUSTOMERS

A clearing member shall confirm to the customer every transaction made for the customer no later than the following business day. Such confirmation shall be in electronic or written form and shall show facts relevant to the economic terms of the transaction, such as the product bought or sold, the quantity, the

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price, the expiration, maturity date or the contract month/year (as applicable), and, for options, strike price, put or call and expiration.

958. BRANCH OFFICES, GUARANTEED INTRODUCING BROKERS, AND ASSOCIATED PERSONS

A. Each clearing member must maintain a complete and accurate list of all branch offices, guaranteed introducing brokers, and the associated persons of the clearing member and its guaranteed introducing brokers. Such list shall be promptly provided to the Exchange upon request.

B. Branch offices, guaranteed introducing brokers, and the associated persons of the clearing member and its guaranteed introducing brokers must comply with Exchange rules. Each associated person of the clearing member or its guaranteed introducing brokers shall be bound by Exchange rules to the same extent as if such person were a member.

C. Each clearing member must diligently supervise its branch offices, guaranteed introducing brokers, and the associated persons of the clearing member and its guaranteed introducing brokers.

D. Each clearing member shall be responsible for the acts or omissions of its branch offices, guaranteed introducing brokers, and the associated persons of the clearing member and its guaranteed introducing brokers. Any violation of an Exchange rule by any such person may be considered a violation by the clearing member.

959. [RESERVED]

OMNIBUS AND CARRYING BROKER ACCOUNTS

960. OMNIBUS AND CARRYING BROKER ACCOUNTS

A. All clearing members must maintain a complete list of all omnibus and carrying broker accounts maintained on their books. Such list shall be promptly provided to the Exchange upon request. Information for each such account must include account name, number and address, and classification of the account as either customer or house. Additionally, the identities and position of the beneficial owners of any omnibus account must be immediately disclosed to the Exchange upon request.

B. A clearing member carrying an omnibus account shall have the responsibility for ensuring that each person carried in the account does not exceed speculative limits unless granted an exemption pursuant to Rule 559.

C. Each clearing member carrying an omnibus account must at all times reflect in its records the gross long and short positions held in such omnibus account including for positions of separate account customers as required under CFTC Regulation 1.58.

D. Clearing members may only carry omnibus accounts for entities that have received a notice from the clearing member (i) expressly prohibiting the omnibus account from acting for customers of the Exchange, directly or indirectly, that are Sanctioned Parties as defined by Rule 543 and (ii) requiring it to send a similar notice to its omnibus customers.

E. Each clearing member that maintains an omnibus account with another clearing member shall also bear financial responsibility to the Exchange for that omnibus account.

F. Clearing members may only carry omnibus accounts for entities that have received a notice from the clearing member (i) notifying the omnibus account of the EU Retail Customer restrictions contained in Rule 570 and (ii) requiring it to send a similar notice to its omnibus customers.

961.-969. [RESERVED]

FINANCIAL REQUIREMENTS AND FINANCIAL EMERGENCIES

970. FINANCIAL REQUIREMENTS

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A. Subject to exemptions granted by Exchange staff, all clearing members, including non-FCMs, must comply with the requirements set forth in CFTC Regulations 1.10, 1.12, 1.17 and 1.18. This includes, but is not limited to, the following:

1. Maintenance of minimum capital requirements of at least $5 million except that a clearing member that is a bank must maintain minimum Tier I Capital (as defined in accordance with regulation applicable to the relevant bank) of at least $5 billion;
2. Submission of a Form 1-FR, FOCUS Report or other requested information within the specified period of time;
3. Notification requirements when a clearing member:
   a. Fails to maintain minimum capital requirements;
   b. Fails to maintain early warning capital requirements;
   c. Fails to maintain current books and records; or
   d. Determines the existence of a material inadequacy as specified in CFTC Regulation 1.16(d)(2);
   e. Changes its fiscal year; or
   f. Changes its public accountant;

In addition to the notifications required by CFTC regulations, all clearing members must provide written notice to the Financial and Regulatory Surveillance Department of the above events.

4. Completely and accurately computing and recording the balances in the net capital computation including capital requirements;
5. Subordination agreement requirements, including the filing of such agreements; and
6. Preparation of a monthly computation of adjusted net capital and minimum financial requirements.

B. For non-FCMs, all filing, notification, and approval requirements set forth in CFTC Regulations 1.10, 1.12, 1.17 and 1.18 and in the rules of the Exchange must be submitted to or obtained from the Financial and Regulatory Surveillance Department, if necessary, rather than the Commission. Non-FCM clearing members shall make available to the CFTC, upon the CFTC's request, copies of financial reports required to be submitted to the Financial and Regulatory Surveillance Department under this Rule.

C. In conjunction with the requirements set forth in CFTC Regulations 1.10, 1.12, 1.17, and 1.18, clearing members must comply with the following requirements:

1. Submit a monthly Form 1-FR or FOCUS Report and the Exchange Supplementary Information schedule including an unaudited monthly Form 1-FR or FOCUS Report as of the clearing member's fiscal year-end, within the time requirements set forth in CFTC Regulation1.10. A clearing member must include with its Form 1-FR or FOCUS Report a Statement of Income (loss) for the period between the date of the most recent financial statement or, at the option of the clearing member, the most recent certified financial statement filed with the Financial and Regulatory Surveillance Department and the date for which the report is made.
2. Submit a certified Form 1-FR or FOCUS Report as of the clearing member's fiscal year-end within the time requirements set forth in CFTC Regulation 1.10. A clearing member must include with its certified Form 1-FR or FOCUS Report, a reconciliation from the certified Form 1-FR or FOCUS Report to the monthly Form 1-FR or FOCUS Report as of the same date or a statement that no differences were noted.
3. A clearing member for which CME is the designated self-regulatory organization may request the Financial and Regulatory Surveillance Department's permission to change its fiscal year. Such request will only be granted for good cause and in accordance with the requirements of CFTC Regulation 1.10(e)(2). The Financial and Regulatory Surveillance Department's grant of the change in fiscal year will fulfill the approval requirements of CFTC Regulation 1.10(e)(2).

D. Exchange staff may prescribe additional accounting, reporting, and other financial and/or operational requirements and clearing members must comply with such requirements. All clearing members must provide notice to the Financial and Regulatory Surveillance Department of a failure to comply with the additional accounting, reporting, financial, and/or operational requirements. The Financial and

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Regulatory Surveillance Department must receive immediate written notification when a clearing member knows or should know of such failure.

E. Financial statement filing requirements under this Rule must be met through Exchange-approved electronic transmissions, except for certified Form 1-FRs or FOCUS Reports.

Personal Identification Numbers (PINS) must be submitted by authorized signers of the Form 1-FR or FOCUS Report. The PIN will constitute and become a substitute for the manual signature of the authorized signer to the electronically filed Form 1-FR or FOCUS Report. The PIN is a representation by the authorized signer that, to the best of their knowledge, all information contained in the statement being transmitted under the PIN is true, correct and complete. The unauthorized use of a PIN for electronic attestation by an unauthorized party is expressly prohibited.

F. Exchange staff may grant exceptions to the financial and reporting requirements of Rule 970 for good cause if it is determined that such exceptions will not jeopardize the financial integrity of the Exchange.

971. SEGREGATION, SECURED AND CLEARED SWAPS CUSTOMER ACCOUNT REQUIREMENTS

A. All clearing members must comply with the requirements set forth in CFTC Regulations 1.20 through 1.30, 1.32, 1.49 and 30.7, and Part 22 of the CFTC Regulations. This includes, but is not limited to, the following:

1. Maintaining sufficient funds at all times in segregation, secured 30.7 and Cleared Swaps Customer accounts;
2. Computing, recording and reporting completely and accurately the balances in the:
   a. Statement of Segregation Requirements and Funds in Segregation;
   b. Statement of Secured Amounts and Funds Held in Separate Accounts; and
   c. Statement of Segregation Requirements and Cleared Swaps Customer Collateral Held in Cleared Swaps Customer Accounts.
3. Obtaining satisfactory segregation, secured 30.7 and Cleared Swaps Customer account acknowledgment letters and identifying segregated, secured 30.7 and Cleared Swaps Customer accounts as such; and
4. Preparing complete and materially accurate daily segregation, secured 30.7 and Cleared Swaps Customer amount computations in a timely manner.

B. All FCM clearing members must submit a daily segregated, secured 30.7 and Cleared Swaps Customer amount statement, as applicable, through Exchange-approved electronic transmissions by 12:00 noon on the following business day.

C. In addition to complying with all applicable CFTC regulations, in order for each of an FCM clearing member's customer segregated, secured 30.7 and Cleared Swaps Customer accounts held at a depository to be included as segregated and secured 30.7 funds and Cleared Swaps Customer Collateral in their respective origin and calculation:

1. The FCM clearing member must provide the Financial and Regulatory Surveillance Department with access to the account information, in a form and manner prescribed by the Financial and Regulatory Surveillance Department; and
2. The depository must allow the FCM clearing member to provide the Financial and Regulatory Surveillance Department with access to the account information, in a form and manner prescribed by the Financial and Regulatory Surveillance Department.

D. All FCM clearing members must submit a report of investments in a manner as prescribed through Exchange-approved electronic transmissions as of the 15th of the month (or the following business day if the 15th is a holiday or weekend) and last business day of the month by the close of business on the following business day. The report of investments shall be prepared and shall identify separately for segregated and secured 30.7 funds and Cleared Swaps Customer Collateral held:

1. The dollar amount of funds held in cash and each permitted investment identified in CFTC Regulation 1.25(a); and
2. The identity of each depository holding funds and the dollar amount held at each depository.

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E. All disbursements not made for the benefit of a customer from a segregated, secured 30.7 or Cleared Swaps Customer account which exceed 25% of the FCM clearing members excess segregated, secured 30.7 or Cleared Swaps Customer of the respective origin must be pre-approved in writing by the clearing member's Chief Executive Officer, Chief Financial Officer or their authorized representative with knowledge of the firm's financial requirements and position.

1. In determining if a disbursement exceeds the 25% level, such disbursement must be:
   a. Compared to the most recent calculation of excess segregated, secured 30.7 and Cleared Swaps Customer amounts; and
   b. A single disbursement must be reviewed individually and in the aggregated with all other disbursements not made for the benefit of a customer of the respective segregated, secured 30.7 or Cleared Swaps Customer origin since the last calculation of excess funds.
2. Upon approval of a single disbursement or the disbursement which in the aggregated exceeds the 25% level as defined in Rule 971.E.1., the FCM clearing member must provide immediate notification to the Financial and Regulatory Surveillance Department through Exchange-approved electronic transmissions. Such notification shall include:
   a. Confirmation that the FCM clearing member's Chief Executive Officer, Chief Financial Officer or authorized representative with knowledge of the firm's financial requirements and position pre-approved in writing the disbursement(s);
   b. The amount(s) and recipient(s) of such disbursement(s); and
   c. A description of the reasons for the single or multiple transaction(s) that resulted in the disbursement(s).
3. The FCM clearing member's Chief Executive Officer and Chief Financial Officer will remain responsible for the pre-approvals by their authorized representative and for compliance with this rule.

F. All clearing members must provide written notice to the Financial and Regulatory Surveillance Department of a failure to maintain sufficient funds in segregation, secured 30.7 or Cleared Swaps Customer accounts. The Financial and Regulatory Surveillance Department must receive immediate written notification when a clearing member knows or should have known of such failure.

G. Each statement and report filing required under this Rule must be submitted by the Chief Executive Officer, Chief Financial Officer or their authorized representative as approved by CME using their assigned User Identification ("User ID"). The User ID will constitute and become a substitute for the manual signature of the authorized signer to the electronically submitted daily segregated, secured 30.7 and Cleared Swaps Customer amount statements. The User ID is a representation by the authorized signer that, to the best of their knowledge, all information contained in the statement being transmitted under the User ID is true, correct and complete. The unauthorized use of a User ID for electronic attestation by an unauthorized party is expressly prohibited.

H. Exchange staff may prescribe additional segregation, secured 30.7 and Cleared Swaps Customer amount requirements.

972. REDUCTIONS IN CAPITAL

A clearing member must provide written notice to the Financial and Regulatory Surveillance Department as set forth below of any substantial reduction in capital as compared to the most recent filing of a financial report.

1. If any event or series of events, including any withdrawal, advance, loan or loss would cause, on a net basis, a reduction in net capital as reported on the Form 1-FR, or in tentative net capital as reported on the FOCUS Report for broker/dealers, of 20% or more, notice must be provided within two business days of the event or series of events causing the reduction; and
2. If equity capital of the clearing member or a subsidiary or a consolidated affiliate would be withdrawn by action of a stockholder or a partner or by redemption or repurchase of shares of stock by any of the consolidated entities or through the payment of dividends or any similar distribution, or an unsecured advance or loan would be made to a stockholder, partner, sole proprietor, employee or affiliates, such that the withdrawal, advance or loan would cause, on a net basis, a reduction in excess net capital of 30% or more, notice must be provided at least two business days prior to the withdrawal, advance or loan that would cause the reduction.

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3. A clearing member that is a bank must provide notice if any event or series of events, including any withdrawal, advance, loan or loss would cause, on a net basis, a reduction in Tier I capital as reported on the most recent filing of a financial report, of 20% or more. Notice must be provided within five business days of the event or series of events causing the reduction or when the clearing member knows or should know of the reduction in Tier I capital. [3]

The foregoing shall not apply in the case of a reduction in capital resulting from (1) the repayment or prepayment of subordinated liabilities for which notice has been given in accordance with Rule 970 or (2) any futures or securities transaction in the ordinary course of business between a clearing member and any affiliate where the clearing member makes payment to or on behalf of such affiliate for such transaction and then receives payment from such affiliate for such transaction within two business days from the date of the transaction.

973. CUSTOMER ACCOUNTS WITH THE CLEARING HOUSE[4]

All customer funds deposited with the Clearing House on behalf of customers protected by CFTC Regulation 1.20 shall be held in accordance with the Commodity Exchange Act and CFTC Regulation 1.20 in an account identified as Customer Segregated. Such customer funds shall be segregated by the Clearing House and treated as belonging to the customers of the clearing member. Pursuant to this rule, a clearing member shall satisfy the segregation acknowledgement letter requirement of CME Rule 971.A.3., the Commodity Exchange Act, and CFTC Regulation 1.20 for customer deposits held at the Clearing House. A clearing member fully authorizes the Clearing House to comply with all requirements of CFTC Regulation 1.20 with regards to its Customer Segregated account.

All Cleared Swaps Customer Collateral deposited with the Clearing House on behalf of Cleared Swaps Customers shall be held in accordance with Part 22 of the CFTC Regulations in an account identified as a Cleared Swaps Customer Account. Such Cleared Swaps Customer Collateral shall be segregated by the Clearing House and treated as belonging to such customers of the clearing member. Pursuant to this rule, a clearing member shall satisfy the Cleared Swaps Customer Account acknowledgement letter requirement of CME Rule 971.A.3, the Commodity Exchange Act, and CFTC Regulation 22.5 for customer deposits held at the Clearing House. A clearing member fully authorizes the Clearing House to comply with all requirements of CFTC Regulation 22.5 with regards to its Cleared Swaps Customer account.

All customer funds deposited with the Clearing House on behalf of customers protected by CFTC Regulation 30.7 shall be held in a manner consistent with CFTC Regulation 30.7 in an account identified as Customer Secured 30.7. Such customer funds shall be segregated by the Clearing House and treated as belonging to such customers of the clearing member. Pursuant to this rule, a clearing member shall satisfy the acknowledgement letter requirement of CME Rule 971.A.3., the Commodity Exchange Act, and CFTC Regulation 30.7 for customer deposits held at the Clearing House. A clearing member fully authorizes the Clearing House to comply with all requirements of CFTC Regulation 30.7 with regards to its Customer Secured 30.7 account.

974. [RESERVED]

975. EMERGENCY FINANCIAL CONDITIONS

If the Global Head of Clearing determines that the financial or operational condition of a clearing member or one of its affiliates is such that to allow that clearing member to continue its operation would jeopardize the integrity of the Exchange, or negatively impacts the financial markets by introducing an unacceptable level of uncertainty, volatility or risk, whether or not the clearing member continues to meet the required minimum financial requirements, they may empanel the Chief Executive Officer, the Chairman of the Board, a Chairman of the Clearing House Risk Committee, the Chairman of the Clearing House Oversight Committee and the Global Head of Clearing or their respective designees. ("Emergency Financial Committee") Such panel shall be duly authorized and, upon a unanimous vote of the panel, be empowered to order (a) an immediate position limitation, (b) an immediate suspension of the clearing member, (c) that all open trades of said clearing member be for liquidation only, (d) the liquidation or transfer of all or a portion of the open positions of the clearing member, (e) additional performance bond to be deposited with the Clearing House and/or (f) any other action necessary to protect the financial integrity of the Clearing House. The clearing member affected by action taken shall be notified and may

[3] Adopted May 2011.
[4] Revised October 2010.

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request a hearing before the Board pursuant to the procedures set forth in Rule 412. To the extent that the panel orders that all open trades of a clearing member be for liquidation only, or the panel orders the liquidation or transfer of all of the open positions of a clearing member, Rule 913.B. shall apply and the clearing member shall be treated as a withdrawing clearing member.

976. SUSPENSION OF CLEARING MEMBERS

If a clearing member becomes insolvent, the clearing member must immediately notify the Exchange of such insolvency. The insolvency shall be announced by the Global Head of Clearing and thereupon such clearing member shall be deemed automatically suspended. If a member of the Clearing House becomes insolvent, or for other reasons is suspended from the Clearing House, the officers, owners or partners who are members of the Exchange may also be suspended from the Exchange.

A clearing member shall be deemed insolvent:

1. If it files a voluntary petition in bankruptcy or is adjudicated as bankrupt;
2. If it fails to fulfill or promptly adjust all of its Exchange obligations; or
3. If satisfactory proof is made to the Clearing House Risk Committee that it is unable to pay its debts as they fall due in the ordinary course of business.

A clearing member may be suspended by the Clearing House Risk Committee pursuant to Rule 403 if it fails to meet the capital requirements of the Clearing House or the CFTC, or if its financial condition, or the financial condition of one of its affiliates, is such that its continued operation would jeopardize the integrity of the Exchange. Members and clearing members suspended in accordance with this rule shall be notified and may request a hearing before the Board as provided in Rule 412.

977. SUSPENSION OF OFFICERS OR PARTNERS

Whenever an officer, owner or partner of a clearing member is suspended or expelled, the respective clearing member may be suspended or expelled for a like term. Members and clearing members affected by this rule shall be notified and may request a hearing before the Board as provided in Rule 412.

978. OPEN TRADES OF SUSPENDED CLEARING MEMBERS

When a clearing member, having open trades, is suspended or expelled, it may designate a clearing member to close out such transactions through designated personnel and in a manner acceptable to the Clearing House.

When a clearing member that has open positions, defaults to the Clearing House in the deposit of performance bonds or settlements, or is suspended for insolvency, the Global Head of Clearing or their delegate may appoint a clearing member to which all such open positions shall be transferred for liquidation, or may appoint a clearing member to liquidate such positions on behalf of such defaulted or suspended clearing member. If open positions are transferred, all supporting performance bond associated with the positions and any settlement payments due or collected must be delivered to the Clearing House, to be entrusted to the clearing member designated to liquidate the positions. The clearing member appointed to liquidate the positions shall have the right, under the direction of the Global Head of Clearing, to buy or sell for the account of the suspended clearing member such contracts as may be necessary to clear the suspended clearing member's contracts with the Clearing House; the clearing member shall also have the right under the direction of the Global Head of Clearing to make or take delivery.

979. SUSPENDED OR EXPELLED CLEARING MEMBERS

In the event a clearing member has been suspended or expelled, the clearing member shall comply with all orders of the Board, the Clearing House Risk Committee, or the Global Head of Clearing.

In the event of refusal by a clearing member to comply with any order placed upon it, the Clearing House may take whatever means necessary to effect the order.

A clearing member or any member suspended due to a clearing member’s insolvency may be reinstated upon affirmative proof to the Clearing House Risk Committee of such clearing member’s financial responsibility. A member may withdraw from the clearing member and may apply for reinstatement to membership in the Exchange provided that the insolvency of the clearing member was not caused by such member’s willful, reckless or unbusinesslike conduct.

RECORDS AND REPORTS

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980. REQUIRED RECORDS AND REPORTS

A. Each clearing member shall prepare, maintain and keep current those books and records required by the rules of the Exchange, the Commodity Exchange Act and the Regulations thereunder. Such books and records shall be open to inspection and promptly provided to the Exchange upon request.

B. Each clearing member shall maintain an adequate accounting system, internal accounting controls, and procedures for safeguarding customer and firm assets. This includes, but is not limited to, the following:

1. Preparation and maintenance of complete and accurate reconciliations for all accounts;
2. Resolution of reconciling items in a timely manner; and
3. Prevention of a material inadequacy as defined in CFTC Regulation 1.16(d)(2).

C. A clearing member must file any information requested by the Exchange within the time period specified in the request.

D. Each clearing member shall maintain at all times the ability to provide to the Exchange in an acceptable form a complete set of equity systems reports (including, at a minimum, the equity run, open position listing, day trade listing, cash adjustments listing and performance bond call and debit equity listing). Such reports shall be available to the Exchange in Chicago no later than 8:00 a.m. Chicago time on the business day following the report date.

E. Each clearing member shall maintain at all times the ability to provide to the Exchange a listing of each customer's method of access to CME markets, including front end applications and network connections.

F. Exchange staff may impose administrative fees upon clearing members for late submissions of reports and other information required to be submitted to the Financial and Regulatory Surveillance Department by Exchange Rules. The administrative fees permitted by this Rule 980.F. shall not exceed $1,000 for the initial late submission, plus $1,000 for each additional business day that such report or information is not submitted. Where the late submission of reports or other information may be due to insufficient internal accounting controls or procedures, the Business Conduct Committee may impose disciplinary sanctions in lieu of, or in addition to, the administrative fees.

G. Each Clearing Member must submit daily reports that include all information required by the Clearing House, including but not limited to legal entity identifiers, where available, and end-of-day gross positions by each house origin, by each customer origin and by each individual customer-level account within each customer origin including position of each separate account customer as defined under CFTC Regulation 1.44 if offering separate account treatment. Daily reporting of individual customer-level account information pursuant to this paragraph does not oblige a clearing FCM to look through an omnibus account that it clears for a carrying broker to the underlying customer account.

981. ANTI-MONEY LAUNDERING AND ECONOMIC SANCTIONS COMPLIANCE

Each clearing member shall develop and implement a written compliance program approved in writing by senior management reasonably designed to achieve and monitor the clearing member's compliance with all applicable requirements of the Bank Secrecy Act (31 U.S.C. § 5311 et seq.), the International Emergency Economic Powers Act (50 U.S.C. § 1701 et seq.) ("IEEPA"), the Trading with the Enemy Act (50 U.S.C. App. § 1 et seq.) ("TWEA"), and the Executive Orders and regulations issued pursuant thereto, including the regulations issued by the U.S. Department of the Treasury and, as applicable, the Commodity Futures Trading Commission. That compliance program shall, at a minimum,

1. Establish and implement policies, procedures and internal controls reasonably designed to prevent the financial institution from being used for money laundering or the financing of terrorist activities and to achieve compliance with all applicable provisions of the Bank Secrecy Act, IEEPA, TWEA, and all applicable Executive Orders and regulations issued pursuant thereto;
2. Provide for independent testing for compliance to be conducted by clearing member personnel or by a qualified outside party;
3. Designate an individual or individuals responsible for implementing and monitoring the day-to-day operations and internal controls of the program;
4. Provide ongoing training for appropriate personnel; and

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5. Include appropriate risk-based procedures for conducting ongoing customer due diligence, including, but not limited to:
   a. understanding the nature and purpose of customer relationships for the purpose of developing a customer risk profile; and
   b. conducting ongoing monitoring to identify and report suspicious transactions, and, on a risk basis, to maintain and update customer information, including the information regarding the beneficial owners of legal entity customers.

Clearing members must also supervise and ensure that their guaranteed introducing brokers are in compliance with the provisions contained in this Rule.

982. RISK MANAGEMENT

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, including during Supplemental Trading Hours. 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:

A. 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.[5]
   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.[6]
   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.

B. Additional and/or Alternative Requirements. Exchange or Clearing House staff may prescribe additional and/or alternative requirements in order for clearing members to comply with this Rule.

C. Each clearing member shall promptly provide to Clearing House staff, upon request, information and documents regarding its risk management policies, procedures and practices, including, without limitation, information and documents relating to the liquidity of its financial resources, settlement procedures and operational issues.

D. Each clearing member shall make information and documents regarding its risk management policies, procedures and practices available to the CFTC upon the CFTC's request.

In addition, all FCM clearing members must *comply with* the risk management requirements set forth in CFTC Regulation 1.11: *Risk Management Program for futures commission merchants*.

983. DISASTER RECOVERY AND BUSINESS CONTINUITY

All clearing members must have written disaster recovery and business continuity policies and procedures in place to ensure they are able to perform certain basic operational functions in the event of a significant internal or external interruption to their operations. 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:

A. Clearing members must have procedures in place to allow them to continue to operate during periods of stress or to transfer accounts to another fully operational clearing member with minimal disruption to either the Exchange or their customers. In order to satisfy this requirement, clearing members must perform:
   1. Periodic testing of disaster recovery and business continuity plans.
   2. Duplication of critical systems at back up sites.

[5] Revised December 2008.
[6] Revised December 2008.

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3. Periodic back-up of critical information.

B. Key Staff Contacts. Clearing members must maintain and, at the request of the Exchange, provide accurate and complete information for their key personnel. Clearing members must inform the Exchange in a timely manner whenever a change to their key personnel is made.

C. Additional and/or Alternative Requirements. Exchange staff may prescribe additional and/or alternative requirements in order for clearing members to comply with this Rule.

TAX COMPLIANCE

990. U.S. WITHHOLDING TAX

A. Beginning January 1, 2017, the date on which Section 871(m) of the Internal Revenue Code of 1986, as amended (for purposes of this Rule 990, the "Code"), and related Treasury regulations and other official interpretations thereof, first apply to any transactions on the Exchange:

1. No Clearing Member that is treated as a non-U.S. entity for U.S. federal income tax purposes shall conduct any transaction in equity index products on the Exchange unless:

a. such Clearing Member has entered into a qualified intermediary agreement with the Internal Revenue Service ("IRS") in which the Clearing Member has agreed to assume primary responsibility for reporting, collecting and remitting withholding taxes imposed pursuant to Chapters 3 and 4 of subtitle A, and Chapter 61 and Section 3406, of the Code with respect to any income (including dividend equivalents, as such term is defined in Section 871(m)(2) of the Code and Treasury Regulations Section 1.871-15(c) or any successor thereto) arising from transactions on the Exchange that are entered into by the Clearing Member as an intermediary, including transactions entered into on behalf of such Clearing Member's customers;

b. (i) such Clearing Member has entered into a qualified intermediary agreement with the IRS to become a qualified derivatives dealer ("Qualified Derivatives Dealer") that permits the Exchange to make payments of dividend equivalents (as such term is defined in Section 871(m)(2) of the Code and Treasury Regulations Section 1.871-15(c) or any successor thereto) or deemed payments, to such Clearing Member free from U.S. withholding taxes imposed pursuant to Chapters 3 and 4 of subtitle A, and Chapter 61 and Section 3406, of the Code arising from transactions on the Exchange that are entered into by the Clearing Member for its own account; and

(ii) such transaction entered into by the Clearing Member is within the scope of the exemption from withholding tax for dividend equivalents (as such term is defined in Section 871(m)(2) of the Code and Treasury Regulations Section 1.871-15(c) or any successor thereto) paid to Qualified Derivative Dealers pursuant to Chapters 3 and 4 of subtitle A, and Chapter 61 and Section 3406, of the Code; and

c. such Clearing Member has qualified under such procedures promulgated by the IRS as are in effect from time to time to establish an exemption from withholding under FATCA (as defined below), such that the Exchange will not be required to withhold any amount with respect to any payment made or deemed to be made to such Clearing Member under FATCA. For purposes of this subparagraph c., "FATCA" means the provisions of Sections 1471 through 1474 of the Code, which were enacted as part of the Foreign Account Tax Compliance Act (or any amendment thereto or any successor sections thereof), and related Treasury Regulations and other interpretations thereof, as in effect from time to time, and the provisions of any intergovernmental agreement to implement the FATCA as in effect from time to time between the United States and the jurisdiction of the relevant Clearing Member's residency.

2. Beginning on January 1, 2017, and on each anniversary thereafter, each Clearing Member that is treated as a non-U.S. entity for U.S. federal income tax purposes and that conducts any transaction in equity index products on the Exchange in accordance with Rule 990.A. 1. shall certify to the Exchange that such Clearing Member satisfies the requirements of Rule 990.A.1.(a) through (c) by providing to the Exchange appropriate tax documentation attesting to such

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Clearing Member's federal income tax status, with the first such certification being delivered to the Exchange no later than January 1, 2017. Each such Clearing Member is required to promptly update its certification to the Exchange if required by applicable law or administrative guidance or if the certification is no longer accurate.

3. Beginning on January 1, 2017, and on each anniversary thereafter, each Clearing Member that is treated as a non-U.S. entity for U.S. federal income tax purposes shall provide the Exchange with information relating to the dividend equivalents (as such term is defined in Section 871(m)(2) of the Code and Treasury Regulations Section 1.871-15(c) or any successor thereto) the Exchange pays or is deemed to pay such Clearing Member in sufficient detail and in a sufficiently timely manner to enable the Exchange to report on IRS Forms 1042 and 1042-S (or any successor forms) under Chapters 3 and 4 of subtitle A of the Code, the required amounts and other information relating to dividend equivalents (as such term is defined in Section 871(m)(2) of the Code and Treasury Regulations Section 1.871-15(c) or any successor thereto) and transactions giving rise thereto between the Exchange and the Clearing Member.
4. Each Clearing Member that is treated as a non-U.S. entity for U.S. federal income tax purposes shall promptly inform the Exchange in writing if it undergoes a change in circumstance that would affect its compliance with this Rule 990, or otherwise knows or has reason to know that it is not, or will not be, in compliance with this Rule 990, but in each case, such writing must be delivered to the Exchange no later than within two days of the Clearing Member's knowledge thereof.
5. A Clearing Member that is treated as a non-U.S. entity for U.S. federal income tax purposes shall indemnify the Exchange for any loss, liability or expense (including taxes and penalties) sustained by the Exchange as a result of such Clearing Member failing to comply with the requirements of this Rule 990.

(End Chapter 9)

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Chapter 10
Regulatory Reporting Of Swap Data

1001. REGULATORY REPORTING OF SWAP DATA

For all swaps cleared by the Clearing House, and resulting positions, the Clearing House shall report available creation and continuation data to CME's swap data repository for purposes of complying with applicable CFTC rules governing the regulatory reporting of swaps. For all swaps submitted for clearing to the Clearing House, each counterparty to a swap (or other market participant, as applicable) must provide sufficient information to the Clearing House as requested by the Clearing House to enable it to make its required reports. This information will include, at a minimum, all data fields required by CFTC rules for swap reports.

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Exhibit B-2

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**Computerized Trade Reconstruction ("CTR") Clearing Member Back Office Audit Enforcement Program**
Rule References	**Rule 536**
Advisory Date	**August 29, 2022**
Advisory Number	**CME RA2203-2**
Effective Date	**September 13, 2022**

Effective on trade date Tuesday, September 13, 2022, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME & CBOT Market Regulation Advisory Notice RA0806-3 from March 26, 2008. It is being reissued as a CME-only Advisory Notice in connection with the termination of open outcry trading in all CBOT products.

536.F. Audit Trail Violations

CTR Clearing Member Back Office Audit Enforcement Program

The Market Regulation Department will conduct audits of clearing members to verify that required audit trail information has been accurately recorded and submitted. The CTR audit threshold level for firms failing to pick up and timestamp sequenced cards, verbal order cards and floor orders is 20%. The threshold for all other firm audit trail or recordkeeping deficiencies is 10%.

Percentage calculations will be made based on an examination of a combination of sequenced cards, verbal orders and floor orders totaling 150 documents. The number of documents containing a deficiency(ies) will be divided by the total number of documents examined in determining the deficiency percentage.

Violations of each threshold within 24 months shall be subject to automatic fines in accordance with the following schedule:

First occurrence	$2,500
Second occurrence	$5,000
Subsequent occurrence(s)	$10,000

A firm will have 15 days after receipt of a fine to present evidence to the Market Regulation Department in support of having the fine dismissed. If the firm does not submit such evidence, or if the Market Regulation Department determines that the evidence submitted is insufficient to reduce the percentage below the threshold level, the fine shall be final and may not be appealed.

Notwithstanding the provisions of this Section, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Chief Regulatory Officer.

Questions regarding this Advisory should be directed to the following individuals in Market Regulation:

Jeff Nierman, Lead Data Investigator, 312.341.3195

Jackie Cerven, Lead Data Investigator, 312.872.5341

FAQ Related to CME 536.F.
CTR Clearing Member Back Office Audit Enforcement Program

Q1: How often will clearing firms be audited?

A1: Each firm will be audited at least once every 12 months.

Q2: How will the back-office audit be conducted?

A2: Staff of the Market Regulation Department will conduct the audit. If a clearing firm has multiple divisions, all divisions will be audited at the same time. A minimum of 150 documents covering at least a two-day period will be reviewed. Upon completion of the audit the clearing firm will receive reports detailing the results.

Q3: How will the error percentage be calculated for the "Data Entry Errors" portion of the audit?

A3: The percentage will be based on the total number of identified keypunch errors divided by the total number of documents examined. A document which contains multiple keypunch errors will be counted as one error for purposes of calculating the data entry error percentage.

Q4: How will the error percentage be calculated for the "Collection Deadline" portion of the audit?

A4: The percentage will be based on the total number of documents which are determined to have been collected late divided by the total number of documents examined.

Q5: **Who issues the fines pursuant to the CTR back-office audit fine schedule?**

A5: The fines are issued by the Market Regulation Department.

Q6: May a CTR fine be appealed?

A6: A firm will have 15 days after receiving notice of an automatic fine to present evidence to the Market Regulation Department to have the fine rescinded and the violation dismissed. The Market Regulation Department will determine if such evidence is sufficient to reduce the error percentage below the threshold level. The decisions of the Market Regulation Department are final.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**Reminder Regarding Requirements and Conditions in Connection with Accessing the Trading Floor**
Rule References	**Various**
Advisory Date	**October 1, 2021**
Advisory Number	**CME RA2108-2**

As a reminder, CME has disseminated and posted Guidelines for Trading Floor Access ("Guidelines") outlining the processes and procedures that apply to accessing the trading floor. The Guidelines are available on the CME Group website at www.cmegroup.com/info. These Guidelines are subject to change at any time, and members and their employees remain responsible for ensuring that they review any changes upon notification that they have changed.

Strict adherence to the Guidelines is critical to ensure the safety of all parties on the trading floor, including Exchange staff. Any violation of these requirements and conditions may result in a person being directed to leave the trading floor, and may result in disciplinary action.

Prior to accessing the trading floor, all parties will be required to sign a waiver of liability. In addition, firms and members with employees on the trading floor will be required to sign an indemnification agreement. Those forms are available on the CME Group website at www.cmegroup.com/info.

The following non-exhaustive list of requirements and conditions apply to all members and employees of members while on the trading floor:

- Face shields or face masks must be worn in accordance with the Personal Protective Equipment Requirements and Enhanced Cleaning Precautions as set forth in the Guidelines;
- Compliance with the Required Health Assessment Procedures as set forth in the Guidelines, including temperature screening and screening for any other symptoms prior to entering;
- Agreement to leave the trading floor immediately when directed to do so by any Exchange employee or security personnel;
- Agreement not to enter the building with Covid-19 or with any suspicion that you may have Covid-19, and agreement to follow all directions of Exchange staff concerning return to the trading floor;
- Maintenance of social distancing in accordance with the Guidelines;
- Adherence to all posted signs and markers; and
- Adherence to the directions of Exchange staff regarding entry and exit routes, and the use of shared spaces (lobby, coatroom, breakroom).

Members and employees of members may not, **under any circumstances**, create a disturbance in connection with these requirements and conditions. If you observe someone failing to comply with these requirements and conditions, Exchange staff should be alerted immediately.

You must comply with temperature screening and any other required screening prior to being able to enter the trading floor. If you do not, you will not be permitted to enter the trading floor and will be directed to leave the premises immediately. While on the trading floor, you must comply with all directions of Exchange staff, and obey all posted signs and markers, including this Advisory Notice.

Failure to comply with these requirements and conditions will result in the matter being directed to the Chief Regulatory Officer for handling pursuant to the provisions of Rule 513.B.4. ("Conduct, Apparel, Badges – Sanctions") which authorizes the Chief Regulatory Officer to impose a fine up to $5,000 per offense. Notwithstanding the foregoing, pursuant to Rule 513.B.5., the Market Regulation Department

may also refer the matter to the Chief Regulatory Officer for the issuance of charges pursuant to Rule 406 ("Issuance of Charges").

Failure to comply with the requirements and conditions set forth in this Advisory Notice and any applicable CME Group policies may be deemed to violate the following rules, or any other applicable rules:

Rule 432.Q. ("General Offenses – to commit an act which is detrimental to the interest or welfare of the Exchange or to engage in any conduct which tends to impair the dignity or good name of the Exchange") Rule 432.S. ("General Offenses – to fail to comply with an order of the Board, Exchange staff or any hearing committee").

In addition to the foregoing, pursuant to Rule 413 ("Summary Access Denial Actions"), the Chief Regulatory Officer may order that any party be denied access to any or all CME Group markets or be immediately removed from the trading floor or facility owned or controlled by CME Group.

Members are reminded that pursuant to Rule 501 ("Employees of Members") they are responsible for ensuring that their employees comply with all Exchange rules and may, subject to a determination by an Exchange disciplinary committee, be liable for any fines imposed upon such employees by the Exchange. Additionally, a member's failure to diligently supervise its employees and agents may result in charges for a violation of Rule 432.W. ("General Offenses – for any party to fail to diligently supervise its employees and agents in the conduct of their business relating to the Exchange").

While the Video Trade Resolution System (VTRS) is not available in the new Eurodollar and SOFR options pit, Market Regulation may review surveillance video to assist with the resolution of an outtrade at the request of a member.

Questions regarding this Advisory Notice may be directed to:

Business Continuity Management at BCM@cmegroup.com; or

Market Regulation Rules & Regulatory Outreach at MarketReg.Outreach@cmegroup.com.

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**Use of Wireless LAN Equipment on the Trading Floor**
Rule References	**Rule 507**
Advisory Date	**August 30, 2021**
Advisory Number	**CME RA2101-2**

CME Group offers connections to a wireless network on the trading floor to facilitate the use of wireless local area networks (LAN) by all market participants. The wireless network is designed to alleviate the need for each interested member firm to design, purchase, install, and maintain its own wireless network antennas on the trading floor as well as to significantly increase the number of wireless devices that can be used by the trading floor community. CME Rule 507 ("Electronic Devices") governs the use of electronic devices on the trading floor. The text of CME Rule 507 appears on Page 2 of this Advisory Notice.

This Advisory Notice is being issued as a reminder to the trading floor community of CME Group's general policy on the use of wireless devices/software on the trading floor. The policy is as follows:

1. Only wireless LANs that have been approved by the Exchange are allowed on the trading floor.

2. The use of any device or software that monitors, sniffs, probes, accesses or otherwise 'sees' wireless networks is strictly prohibited.

3. No cordless phones (i.e. those with a base station and handset) or wireless gaming systems of any kind are permitted on the trading floor. Cellular phones, including all smart phones, are permissible provided that bluetooth, mifi and wifi technology have been disabled.

4. **The use of an 802.11 bridge (mifi, wifi, hotspot or similar technologies), bluetooth, or wireless printers on the trading floor is strictly prohibited. All members, member firms and their staffs must ensure that all unauthorized wireless signals are disabled on any device that is being used on the trading floors.**

5. The majority of smart phones, laptops, tablet personal computers, and printers now being sold have wireless network adapters (802.11b/g/n and/or 802.11a) built in at the factory. These adapters must be in an **"OFF"** state in order for these devices to be brought onto the trading floor and must remain in an off state until removed from the floor. If you need assistance in determining the state of the adapter, please call the Floor Technology Support Help Desk at 312.347.5611.

The use of unauthorized wireless communication equipment on the trading floor is strictly prohibited. Violation of these policies may result in disciplinary action and unauthorized wireless equipment will be immediately disconnected and removed from the trading floor.

If you have any questions, please contact one of the following individuals:

Daniel Schneider, Director, Market Regulation, 312.341.7251

Barry Schauer, Trading Floor Investigations Specialist, Market Regulation, 312.341.7640

Erin Middleton, Senior Director, Market Regulation, 312.341.3286

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

507. ELECTRONIC DEVICES

507.A. General Provisions

The use of any electronic device on the trading floor is prohibited unless such device and/or usage has been permitted by the Exchange. For purposes of this rule, the term "electronic device" shall mean any type of voice or data communications interface, including but not limited to a computer, headset, hand-held device, microphone or telephone. No Member (as defined in Rule 400) shall permit others to use any electronic device unless such use has been permitted by the Exchange. Members using a permitted electronic device on the trading floor for permissible business purposes must retain any required audit trail data in accordance with applicable Exchange rules and CFTC regulations.

507.B. Terms and Conditions of Use

The Exchange may, in its sole discretion, impose restrictions on the use of any permitted electronic device by any Member. The Exchange may limit, suspend or terminate any Member's right to use any permitted electronic device at any time, without prior notice and without any liability to the Exchange.

The Exchange shall have the right, at any time, to audit the use of any permitted electronic device by any Member.

The Exchange accepts no responsibility for loss, theft or damage to any equipment permitted for use by a Member on Exchange premises.

Electronic devices that are not issued by the Exchange must not interfere with any Exchange system.

507.C. Electronic Surveillance

The Exchange may intercept and record any electronic communication received or sent from the trading floor to ensure compliance with Exchange Rules. Exchange members, their employees, and all others who are granted access to the trading floor consent, as a condition of their membership, employment, or access to the floor, to the interception, recording, and use of any such communication.

507.D. Personal Electronic Devices

Unless permitted pursuant to Section A. above, personal electronic devices including, but not limited to, cell phones, personal digital assistants (PDAs) and other devices with email, instant messaging or other similar capabilities may be used on the trading floor only for non-business purposes.

507.E. Cameras and Video Equipment

Unless expressly permissioned by the Exchange, the use of any type of camera or video equipment on the trading floor is prohibited.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**Reminder Regarding the Prohibition of Food and Beverages on the Trading Floor**
Rule References	**Rule 513 and the Access, Conduct and Appearance Code**
Advisory Date	**October 1, 2021**
Advisory Number	**CME RA2107-2**

As a reminder, Rule 513 ("Conduct, Apparel and Badges") and the Access, Conduct and Appearance Code ("Code") expressly prohibit carrying or consuming food and beverages on the trading floor. The only exception to the prohibition allows for water, in an approved container, and individually-wrapped (non-chocolate) hard candy and gum on the trading floor.

Members and their employees are reminded that violations of this prohibition are subject to sanctions pursuant to 513.B. ("Sanctions"), which is set forth below.

513.B. Sanctions

1. Designated Exchange officials may impose fines on members or their employees for violations of the Exchange policy concerning access, conduct, and appearance. Fines imposed pursuant to Rule 513.B.1. are final and may not be appealed.
2. A fourth violation of the Exchange policy concerning access, conduct, and appearance within a rolling 18-month period will be subject to a $1,000 fine.
3. A fifth or subsequent violation of the Exchange policy concerning access, conduct, and appearance within a rolling 18-month period will be referred to a summary proceeding before a Panel of the Floor Conduct Committee. The Panel may impose a fine not to exceed $5,000 per violation.
4. Notwithstanding any other provision in this Rule, the Chief Regulatory Officer shall have the authority to impose a fine not to exceed $5,000 per offense on members and their employees for egregious violations of Rule 513.A.
5. The Market Regulation Department, at its discretion, may refer any alleged violation of Rule 513 to the Chief Regulatory Officer for consideration of charges.

Questions regarding this Advisory Notice may be directed to Barry Schauer, Trading Floor Investigations Specialist, Market Regulation, at 312.341.7640.

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**All-or-None Transactions**
Rule References	**Rule 523**
Advisory Date	**April 18, 2022**
Advisory Number	**CME RA2201-2**
Effective Date	**May 2, 2022**

Effective on trade date May 2, 2022, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Market Regulation Advisory Notice RA2104-2 from August 30, 2021. It is being issued enable All-or-None ("AON") transactions for open outcry trading of Options on Three-Month SOFR Futures, Options on One-Month SOFR Futures and all Options on Three-Month Eurodollar Futures.

Market participants are reminded of the following:

1) **AON trades may not, under any circumstances, be prearranged or otherwise involve prohibited pre-execution communications.**

Pursuant to Rule 539 ("Prearranged, Pre-negotiated and Noncompetitive Trades Prohibited"), the prearrangement of AON trades and pre-execution communications with respect to AON trades are strictly prohibited. As such, the only information that may be disclosed by any party with respect to an AON order is information that has been publicly exposed in the trading pit. Parties may not solicit potential counterparties to an AON order until the order has been openly bid or offered in the pit.

2) **AON orders must be competitively and transparently executed in the open market by open outcry.**

All AON trades must be executed openly and competitively, without prearrangement. Bidding and offering practices must at all times be conducive to the competitive execution of trades, and members must ensure that the request for an AON market or the bid or offer for an AON order is clearly and transparently announced to the pit. Additionally, all AON bids and offers must include both quantity and price.

Additionally, in circumstances where a broker has both buy and sell AON orders for accounts with different beneficial ownership, the broker may only cross the orders pursuant to the cross procedures set forth in Rule 533 ("Simultaneous Buy and Sell Orders for Different Beneficial Owners"). Rule 533 requires the broker in these circumstances to bid and offer by open outcry the price and quantity of the AON orders three times. If neither the bid nor offer is accepted, the orders may be matched in the presence, and with the approval, of a designated Exchange official. It is incumbent upon a member handling simultaneous AON buy and sell orders to ensure that their bids and offers for the orders are announced clearly to the pit, and, if executed opposite each other, that the approval of the Exchange official is obtained contemporaneous with the execution of the orders.

Failure to comply with the aforementioned requirements will result in disciplinary action.

Market participants are strongly encouraged to review the FAQ to ensure an accurate understanding of the requirements for executing AON orders. The text of Rule 523 appears below, followed by the FAQ.

Rule 523 ALL-OR-NONE TRANSACTIONS

The Exchange shall determine the minimum thresholds for and the commodities in which All-or-None transactions shall be permitted. The following shall govern All-or-None trading:

1. A member may request an All-or-None bid and/or offer for a specified quantity at or in excess of the applicable minimum threshold. Such request shall be made in the pit designated for the trading of the particular transaction.
2. A member may respond by quoting an All-or-None bid or offer price. A bid or offer in response to an All-or-None request shall be made only when it is the best bid or offer in response to such request, but such price need not be in line with the bids and offers currently being quoted in the regular market.
3. A member shall not execute any order by means of an All-or-None transaction unless the order includes specific instructions to execute an All-or-None transaction or the All-or-None bid or offer is the best price available to satisfy the terms of the order.
4. An All-or-None bid or offer may be accepted by one or more members provided that the entire quantity of the All-or-None order is executed at a single price and that each counterparty to the order accepts a quantity at or in excess of the designated minimum counterparty threshold. Each order executed opposite an All-or-None order must be for a quantity that meets or exceeds the minimum counterparty threshold. Separate orders may not be bunched to meet the minimum counterparty threshold.
5. All-or-None transactions shall not set off conditional orders (e.g., Stop Orders and MIT Orders) or otherwise affect orders in the regular market.
6. All-or-None transactions must be reported to a designated Exchange official who shall record and publish the quantity and prices separately from reports of transactions in the regular market. The brokers executing All-or-None transactions must maintain a record of said transaction in accordance with Rule 536.

FAQ Related to CME Rule 523
All-or-None Transactions

Q1: What is an All-or-None ("AON") Order?

A1: An AON order is an order that meets or exceeds an exchange-specified minimum quantity that can be executed only for its entire quantity and only at a single price. AON orders are permitted solely in Options on Three-Month SOFR Futures and Options on One-Month SOFR Futures executed in the open outcry market during Regular Trading Hours.

Q2: What are the significant differences between AON transactions and other trades executed via open outcry?

A2:
1. AON bids, offers and requests for a market must be for a quantity equal to or in excess of 1,000 contracts for options on Three-Month SOFR futures and 250 contracts for options on One-Month SOFR futures. The contract minimum threshold applies to each leg of any spread or combination trade executed as an AON.
2. Partial fills for an AON order are not permitted.
3. The execution price of an AON order may be outside of the best bid/offer in the regular market.
4. The price at which an AON order is executed does not elect conditional orders (e.g., stop orders, limit orders, MIT orders, etc.) in the regular market or otherwise affect such orders.
5. AON transactions are reported separately from transactions in the regular market in the Time and Sales record.

Q3: May an AON order be executed opposite more than one counterparty?

A3: Yes. An AON order may be executed opposite multiple counterparties provided that the order is filled in its entirety at a single price and each opposing party to the order receives 10% or more of the AON order's full quantity.

Q4: May a broker bunch separate orders to meet the counterparty minimum?

A4: No. *Each* order executed opposite an AON order must be for a quantity that meets or exceeds the minimum counterparty threshold.

Q5: What is the proper procedure for initiating an AON transaction in the pit?

A5: The initiator of the AON order may request an AON market for a specific quantity or make an AON bid/offer for a specific quantity and price. **Any requests for an AON market and all AON bids and offers must be made openly and clearly announced in the pit.**

A member may respond by quoting an AON bid and/or offer price and the quantity, at or above the designated counterparty minimum, that they are willing to trade. Brokers who have orders that independently meet the minimum counterparty quantity threshold may also bid/offer in response to a request for an AON market.

The individual representing the AON order must determine if the total quantity bid/offered is sufficient to satisfy the entire quantity of the AON order at a single price. If so, they will consummate the AON trade with the opposing market participants. Just as in the regular market, it is the broker's responsibility to allocate quantities if there is more than one opposing party.

Q6: May two AON orders be crossed?

A6: AON orders to buy and sell that are for different beneficial owners and are initiated **without prearrangement** may be competitively executed opposite each other in the open market. A single broker may directly cross two AON orders provided that the cross trade procedures set forth in Rule 533 ("Simultaneous Buy and Sell Orders for Different Beneficial Owners") are followed.

Additionally, a broker executing an AON order may not take the opposite side of the order, or any portion of the order, into their own account (or an account in which they have a direct or indirect financial interest or an account over which they have discretionary trading authority) unless the customer has provided prior written consent to waive the application of Rule 531.A. ("General Prohibition") and the broker complies with the cross trade procedures set forth in Rule 533.

Q7: May intra-commodity options spreads or options combinations be executed pursuant to Rule 523?

A7: Yes, provided that each leg of the spread meets the contract's minimum quantity requirement.

Q8: Are spreads involving SOFR options versus SOFR futures permitted to be executed as an AON?

A8: Yes, provided that at least one option leg of the spread order meets the specified contract AON minimum order quantity and the quantity of the futures leg is the appropriate delta equivalent.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Barry Schauer, Trading Floor Investigations Specialist, 312.341.7640

Daniel Schneider, Director, Investigations, 312.341.7251

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**Registration and Identification of Broker Associations**
Rule References	**Rule 515**
Advisory Date	**April 18, 2022**
Advisory Number	**CME RA2202-2**
Effective Date	**May 2, 2022**

Effective trade date May 2, 2022, and pending all relevant CFTC regulatory review periods, this Advisory Notice supersedes CME Market Regulation Advisory Notice RA2103-2 from August 30, 2021. It is being issued to notify CME members that all SOFR options contract months will be added to the list of contracts subject to the intra-association trading restrictions pursuant to CME Rule 515.E. ("Trading Restrictions"), on May 2, 2022.

All contract months of SOFR options (collectively, "Interest Rate options") are subject to the intra-association trading restrictions pursuant to CME Rule 515.E. ("Trading Restrictions");

The complete text of Rule 515 begins on page 2 of this Advisory Notice.

Interest Rate Options Trading Restrictions as of May 2, 2022

The intra-association trading restrictions among members of CME broker associations operating in Interest Rate options are set forth below.

A. Contract Months Subject to the Restrictions
All listed contract months from the first day of trading through the last day of trading.

B. Restrictions
Order executions in restricted contract months by members of a broker association opposite other members of the same broker association are limited to 20% per month.

Best and Only Bid and Offer Documentation

In circumstances where two members of the same broker association trade opposite one another in a contract month subject to the trading restrictions set forth above, and at the time the trade is executed one member is the best and only bid and the other member is the best and only offer, the quantity associated with the execution will be removed from each member's monthly intra-association percentage restrictions **provided that all of the following requirements are met**:

1. A note is made on the trading document by one of the two members involved in the trade indicating that at the time the trade was executed, one member was the best and only bid and the other member was the best and only offer in the pit. Noting "B&O" on the trading document is sufficient for this purpose. That notation must be made contemporaneously with the trade being made.
2. The time of the trade to the nearest minute is recorded on the trading document containing the B&O notation.
3. A signature and a **legible** acronym of a member (or the signature of an Exchange official) attesting to the fact that the members were the best and only bid and best and only offer at the time the trade was made **must be** noted on the trading document. The signature and acronym of

the member (or the signature of the Exchange official) must be obtained as soon as possible after the trade has been made. **Members executing the trade may request signatures only from members (or Exchange officials) who were present when the trade was made. Members signing such trading documents may do so only if they were present and can attest to the fact that the trade was a best and only bid and offer at the time it was made.** Members of the same broker association are not eligible to sign as a witness for this purpose.

4. Copies of the documentation are forwarded to the Market Regulation Department, marked to the attention of Jackie Cerven or Jeffrey Nierman.

Properly documented best and only bids and offers will be removed from each member's intra-association trading volume and total trade volume when calculating compliance with the applicable trading restrictions. If the removal of the volume associated with the best and only bids and offers results in the reduction of a member's intra-association trading percentage to a non-violative level, the member will not be deemed to have violated Rule 515.E.

Documentation that does not meet all the requirements set forth above will not be accepted by the Market Regulation Department.

Questions regarding this advisory may be directed to one of the following individuals in Market Regulation:

Jackie Cerven, Lead Data Investigator, at 312.872.5341

Jeffrey Nierman, Lead Data Investigator, at 312.341.3195.

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

515. REGISTRATION AND IDENTIFICATION OF BROKER ASSOCIATIONS

515.A. Definitions

1. Floor Brokerage Activity - The execution or pre-execution handling of orders on the trading floor.
2. Broker Association - A broker association shall include the following associations between two or more members with trading floor access privileges, at least one of whom is engaged in floor brokerage activity:
   a. Revenue Sharing Association: Associations between members who:
      i. share profits or losses associated with their brokerage and/or error account activity; and/or
      ii. have an employer and employee relationship which relates to floor brokerage activity;
   b. Non-Revenue Sharing Association: Associations between members who:
      i. regularly share a deck of orders; and/or
      ii. share employee salary expenses.
   c. Any other group or combination deemed by the Exchange to be a broker association.
3. Principal of a Revenue Sharing Association – Each individual who has formal or de facto control over the affairs of, or has a ten percent or greater ownership interest in, a Revenue Sharing Association not owned by a clearing member firm.
4. Spokesperson of a Non-Revenue Sharing Association and Revenue Sharing Associations owned by a clearing member firm – An individual authorized to represent a Non-Revenue Sharing Association or Clearing Firm owned Revenue Sharing Association in connection with its registration obligations set forth in Section B.
5. Investor – An individual who has a direct beneficial interest in a Revenue Sharing Association but is not a principal as defined in A.3. above.

515.B. Registration Requirements

1. A member of a broker association shall not handle or execute an order unless that association has registered with the Exchange.
2. Members or Member Firms must have majority ownership interest in any broker association.

3. Principals involved in floor brokerage activity must have trading privileges in the membership division required for access to the products handled by the members of the association. Principals who are not involved in floor brokerage activity must own a membership in the membership division required for access to the products handled by the members of the association. Notwithstanding the above, principals not regularly involved in floor brokerage activity may hold a membership in any division in circumstances where the association is owned by a Member Firm and such Member Firm owns a membership in the membership division required for access to the products handled by the members of the association.
4. No registered broker association or member thereof shall permit a party to have any direct or indirect profit or ownership interest in a broker association unless such party is registered in the association in accordance with this rule.
5. Registration shall be accomplished by filing the appropriate registration forms with the Market Regulation Department.
6. It shall be the responsibility of the broker association and its principals or spokespersons to ensure that the association is properly registered. Any additions, deletions or other changes to the information already reported must be provided to the Market Regulation Department within two business days after the event giving rise to such changes.
7. The Exchange may request any additional information from a broker association as deemed appropriate.

515.C. Prohibition on Sharing of Personal Trading Profits

Registrants in a broker association may not share profits or losses associated with their personal trading activity by direct or indirect means, except for profits and losses related to brokerage errors.

515.D. Supervision

Each principal of a Revenue Sharing Association must diligently supervise the association's member registrants and non-member employees and may be held directly liable for violations of any rule of the Exchange by such registrants and employees. Regardless of whether the principal is held responsible for the act or acts constituting the violation, each principal is jointly liable for the payment of any fines assessed against another principal, registrant or employee of the association provided that the violation occurred while that person was functioning in their capacity with the association.

515.E. Trading Restrictions

The Exchange may impose limits on the percentage of personal trading and/or brokerage volume that members of a broker association may execute with one another. Violations of such restrictions will result in summary action according to the following schedule on a rolling 12 month period:

First Occurrence Letter of Warning

Second Occurrence $5,000 fine

Subsequent Occurrence $10,000 fine

The Exchange may restrict a member of a Revenue Sharing Association from trading for any account such member owns, controls or in which such member has a financial interest opposite other members of the association executing orders. Violation of such restrictions will result in summary action according to the following schedule on a rolling 24 month period:

First Occurrence Letter of Warning

Second Occurrence $500 fine

Third Occurrence $1,000 fine

Subsequent Occurrence $5,000 fine

Actions taken pursuant to this section are final and may not be appealed; however members will have 15 days following receipt of notification of the action to present evidence to the Market Regulation Department that administrative, clerical or other errors caused the apparent rule violation.

Notwithstanding the provisions of this section, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Chief Regulatory Officer for the consideration of charges.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**Outtrades**
Rule References	**Rule 527**
Advisory Date	**August 30, 2021**
Advisory Number	**CME RA2105-2**
Effective Date	**October 1, 2021**

Effective on trade date Friday, October 1, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME & CBOT Market Regulation Advisory Notice RA0804-3 from March 11, 2008. It is being issued as a CME-only Advisory Notice in connection with amendments to CBOT Rule 527 that become effective on October 1, 2021.[1]

The rules and procedures for the proper resolution of outtrades in no way limit a member's right to submit a claim related to the resolution of an outtrade to arbitration in accordance with the provisions of Chapter 6 ("Arbitration").

Members who discover an outtrade during Regular Trading Hours ("RTH") must immediately 1) notify the opposite trader, 2) determine who will cover the outtrade, and 3) cover the outtrade. Outtrades discovered after an RTH session has ended must be resolved no later than the opening of the next RTH session.

It is imperative that members resolve outtrades in a timely fashion. Financial liability resulting from the resolution of an outtrade is limited to the opening price(s) of the next RTH session. However, a party who unreasonably fails to cover an outtrade during the intervening period may be liable for the difference between the opening price(s) of the next RTH session and the price at which the outtrade could have been covered during the intervening period, including during electronic trading hours or in an appropriate alternative market.

The text of Rule 527 begins on page 4 of this Advisory Notice.

Straight Out Outtrades Involving Orders

A floor broker who discovers that they have a straight out outtrade in connection with a trade that was executed in the market for an order has two options for resolving the outtrade.

1. Re-execution - The broker may re-execute the order. If the re-execution price is worse than the original execution price, then the broker must adjust the customer by check to the original execution price. If the re-execution price is better than the original execution price, the customer is entitled to the better price.
2. Assignment - The broker may assign the opposite side of the trade that cannot be cleared to their error account, thereby filling the order at the original execution price. The broker may not liquidate the position assigned to their error account until at least ten minutes have passed from the time of the original execution of the order and the bracket period in which the outtrade occurred has ended (unless the liquidation takes place during the post close session where such time restrictions do not apply). Any profits or losses resulting from the liquidation of the position in the broker's error account belong to the broker and they may retain or disburse any profits at their discretion.

[1] Please see Special Executive Report S-8833 from August 27, 2021, for additional information on the rule amendments.

Price Outtrades

Provided that the members involved in the outtrade agree that the trade was executed at one of the two prices in question, the outtrade must be resolved by clearing the trade at the execution price.

If the outtrade involves a price discrepancy between a local and a broker and the parties cannot agree on the price of execution, the price recorded by the broker shall be used to clear the trade. If the outtrade is between two locals or two brokers and the parties cannot agree on the price of execution, the buyer's price shall be used to clear the trade.

In the case of a price outtrade between two brokers in which the members cannot agree on the execution price and the buyer's price is therefore used to clear the trade, the broker representing the sell order may resolve the outtrade in any of the following ways:

1. Clear the sales for the order at the buyer's price. If the price is worse than the originally confirmed price, the broker must adjust the customer by check to the confirmed execution price.

2. Clear the sales at the buyer's price in their error account and re-execute the order. If the re-execution price is worse than the original execution price, then the broker must adjust the customer by check to the original execution price.

3. Clear the sales at the buyer's price in their error account and assign a fill at the original execution price to the sell order opposite their error account pursuant to the assignment trade procedures.

Quantity Outtrades

Provided that the members involved in the outtrade agree that the trade was executed for one of the two quantities in question, the outtrade must be resolved by clearing the trade at the executed quantity.

If the outtrade is between two locals and the parties cannot agree on the quantity that was executed, the higher quantity shall be used to clear the trade.

A broker may assign the opposite side of the uncleared portion of a quantity outtrade that they believe they have executed to their error account and assign a fill to the order at the execution price pursuant to the assignment trade procedures.

Bona Fide Contract Month, Strike, Put vs. Call and Side of Market (Buy vs. Buy or Sell vs. Sell) Outtrades

A broker who believes that they have executed an order in accordance with its instructions and is involved in an outtrade due to a contract month, strike price, side of market or put/call discrepancy may resolve the outtrade in any of the following ways:

1. The trade may be busted. If the broker re-executes the order at a price less favorable than the price to which the order was entitled, the customer must be adjusted by check. If the order is re-executed at a more favorable price, the customer is entitled to the better price.

2. Either or both trades may be cleared in accordance with the members' recorded data.

3. The broker may assign the opposite side of the order to their error account, thereby filling the customer at the execution price, and may also agree to clear the other party's outtrade in their error account.

4. If both members are representing customer orders, both brokers may assign the opposite side of their respective orders to their error accounts pursuant to the assignment trade procedures.

Assignment Trade Requirements

Error Account Requirements

All assignment trades must be placed into the broker's error account. Firms that utilize house brokers and allocate the brokers' errors to the firm's error account must maintain sub-accounts held in the name of each floor broker for this purpose.

Liquidation Requirements

If a broker assigns an **outtrade** to their error account, the position may not be liquidated until 1) at least 10 minutes have elapsed since the time of the original execution **and** 2) the bracket period has changed. Therefore the broker must wait at least 10 minutes, and possibly as long as 15 minutes, after the original execution before liquidating the assigned position. However, an assignment trade may be liquidated during the post-close session regardless of when the outtrade occurred. Profits or losses resulting from the offset of such assignments belong to the floor broker and any profits may be retained or disbursed to whomever they choose at their discretion.

In the case of an **unfilled or underfilled order**, the order must first be executed in the market and may be assigned only if the quantity executed in the market is at a worse price than the price to which the customer was entitled. In this case, the trade executed in the market and the assignment trade will offset each other at a loss in the broker's error account.

Recordkeeping Requirements

Assignment trades must be clearly identified as a type "Z" trade on the trading documents used to record the trades for the broker's error account. Firms must keypunch the broker's assignment trade allocated to the broker's error account as order type "Z".

The circumstances surrounding the assignment trade must be documented in writing. Members may record the circumstances on the trading document used to record the assignment trade. Members recording the circumstances on another document must retain the document and must provide the document to Market Regulation upon request.

In accordance with Rule 536, trades that are not recorded contemporaneously due to an error or an outtrade must be recorded on the member's next pre-printed, sequentially numbered trading card. If the trade is not recorded in sequence (and the member uses trading cards to record their trades), the member must cross out the pre-printed sequence number and write "9999" on the card. If a person other than the member records the trade, the person who records the trade must initial the card.

Under no circumstances shall it be permissible for a floor broker to guarantee, directly or indirectly, the execution of an order, or any of its terms, except in the case of a bona fide error or mishandling.

No member firm may pressure a floor broker to improperly guarantee an execution or to resolve an outtrade other than in accordance with Rule 527. Additionally, no member firm may refuse to accept a bona fide fill from a floor broker which results from the floor broker's resolution of an outtrade in accordance with Rule 527.

Violations of Rule 527 may result in disciplinary action.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Barry Schauer, Trading Floor Investigations Specialist, 312.341.7640

Tom Ozga, Trading Floor Investigations Specialist, 312.341.7638

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

527. OUTTRADES, ERRORS AND MISHANDLING OF ORDERS

527.A. Outtrades Discovered During a Regular Trading Hours Trading Session

It shall be the duty of a member discovering an outtrade during a Regular Trading Hours session to immediately notify the opposite trader. Thereafter, if the matter cannot be resolved between the parties, they shall immediately determine who will cover the trade and the trade shall immediately be covered.

527.B. Outtrades Discovered After a Regular Trading Hours Trading Session

A clearing member that is unable with diligent effort to resolve an outtrade with another clearing member shall notify the member who executed the trade. Such notice shall be given prior to the following day's Regular Trading Hours session in sufficient time to allow the member to make provisions for the resolution of the outtrade.

Outtrades discovered after a Regular Trading Hours session shall be resolved between the parties to the outtrade as provided in this rule, no later than the opening of trading of the next Regular Trading Hours session.

527.C. Outtrades Resolution

To resolve an outtrade, the parties shall attempt to agree upon: (1) the reconciliation of any discrepancy in the terms of the trade, (2) which party will cover the trade and the method for covering the trade, if applicable, and (3) the apportionment of the financial results of the outtrade. In the event the parties are unable to agree on the apportionment of the financial results, the parties must nevertheless immediately reconcile the outtrade.

The price at the time of the open of the next Regular Trading Hours session shall fix the limit of liability as a result of the outtrade. Regardless of the ultimate determination of financial responsibility for the outtrade, a party who unreasonably refuses to cover the outtrade via an appropriate alternate market may be liable to the other party for the difference between the price at which the outtrade could have been covered in the alternate market and the price at the time of the open of the next Regular Trading Hours session.

Outtrades shall be resolved in accordance with the procedures below:

1. Straight Out Customer Outtrades

   If a floor broker discovers that all or some portion of a customer order was executed but cannot be cleared, the broker shall either 1) re-execute the order in the market and adjust the customer by check if the re-execution price is worse than the original execution price, or, if the re-execution price is better than the original execution price, the customer is entitled to the better price or 2) assign the opposite side of the portion that cannot be cleared to their error account and assign a fill to the customer at the execution price. The floor broker shall not liquidate the assigned position until at least ten minutes have elapsed after the execution of the order giving rise to the outtrade and the bracket period in which the outtrade occurred has ended; however, these liquidation restrictions shall not apply to a liquidation during the post close session. Any profits or losses resulting from the liquidation of the assigned position belong to the floor broker and any such profits may be retained or disbursed at their discretion.

   A floor broker who assigns the opposite side of an order pursuant to this rule shall: 1) clearly identify all such transactions by appropriate designation; 2) submit such trade information to their qualifying clearing member in sufficient time to enable the clearing member to submit the trade for the next intra-day reconciliation; 3) document in writing the circumstances surrounding any such transaction and promptly provide such documentation to the Market Regulation Department upon request; and 4) identify the subsequent liquidation of the assigned trade on the floor broker's trading card or other document.

2. Price Outtrades

When an outtrade exists due to a price discrepancy, members making the trade may choose to resolve the discrepancy by electing either of the two prices in question, if they agree that the trade was executed at that price.

If an outtrade involves a price discrepancy between a local and a broker, and the members cannot agree on the price of execution, the price recorded by the broker shall be used to clear the trade.

If an outtrade between locals or an outtrade between brokers involves a price discrepancy, and the members cannot agree on the price of execution, the buyer's price shall be used to clear the trade.

3. Quantity Outtrades

When an outtrade exists due to a quantity discrepancy, members making the trade may choose to resolve the discrepancy by electing either of the two quantities in question, if they agree that the trade was executed for that quantity.

If an outtrade between locals involves a quantity discrepancy and the members cannot agree on the quantity that was executed, the higher quantity shall be used to clear the trade.

A broker may assign the opposite side of any quantity which they believe that they have executed, but which cannot be cleared, to their error account, pursuant to Section 1 above.

4. Bona Fide Contract Month, Strike, Put vs. Call and Side of Market (Buy vs. Buy or Sell vs. Sell) Outtrades

When an outtrade exists due to a contract month, strike price, side of market, or put/call discrepancy, and any party who executed a customer order believes that the order was executed in accordance with its instructions, the outtrade may be resolved in any one of the following ways:

a. The trade may be busted. If a broker re-executes their order, any losses incurred by the customer as a result of the delay in execution must be adjusted by check. If the order is executed at a more favorable price, the customer is entitled to the better price.

b. The members making the trade(s) may agree to clear either trade or both trades in accordance with the members' recorded trade data.

c. A broker may assign the opposite side of their order to their error account, pursuant to Section 1. above, and they may agree to the clearing of the transaction according to the terms of the other member's recorded trade data.

d. If both members involved in the outtrade are brokers, they may each assign the opposite side of their respective orders to their error accounts pursuant to Section 1. above.

A customer shall not be entitled to any portion of any profits realized by a local who was on the opposite side of an outtrade between the local and the customer's broker, as a result of the local's liquidation of their position. Such profits belong to the local, and may be retained or disbursed at their discretion. If the local chooses to disburse any portion of such profits to the broker, and the broker's customer has received a fill in accordance with the broker's recorded trade data, the broker is not obligated to offer such profits to their customer.

Nothing herein shall in any way limit a member's right to submit an outtrade to Exchange arbitration if the outtrade cannot be resolved by agreement.

527.D. Errors and Mishandling of Orders

If a broker overbuys or oversells for an order, the customer is not entitled to any of the quantity executed in excess of the order quantity. A position that has been established as a result of an erroneous execution or mishandling of an order must be placed in the error account of the broker or firm responsible for the error or order mishandling. Any profits resulting from the liquidation of trades placed in a broker's or firm's error account belong to the relevant broker or firm, and any such profits may be retained or disbursed at the broker's or firm's discretion.

1. Unfilled or Underfilled Orders

If a broker fails to execute an order or underbuys or undersells for an order, the broker shall do one of the following:

a. Execute the order or the remainder of the order in the market and adjust the customer by check if

the customer is filled at a price less favorable than that to which they were entitled due to the broker's error or mishandling of the order. If the order is filled at a more favorable price, the customer is entitled to the better price.

b. Execute the order or the remainder of the order in the market. If the order, or the remainder of the order, is filled at a worse price than that to which the customer was entitled but for the error or mishandling, the broker may allocate the fill to their error account, pursuant to Section C.1. above, provide the customer a fill at the price to which the customer was entitled, and place the opposite side of the customer fill into their error account. If the order is filled at a more favorable price, the customer is entitled to the better price.

2. Wrong Contract Month, Wrong Strike, or Wrong Commodity Executions

When an order has been executed in the wrong contract month, wrong strike price, or wrong commodity, and the erroneous transaction has been placed in the relevant broker's or firm's error account, the error may be corrected by one of the following:

a. Execution of the order in accordance with its terms, with an adjustment to the customer by check if the order is executed at a worse price as a result of the error or mishandling of the order.

b. Execution of a spread or combination transaction to execute the order and liquidate the position arising from the initial erroneous execution of the order, whereby one leg of the spread or combination transaction represents the correct execution of the order and the other leg offsets the erroneous position in the broker's or firm's error account. The broker or firm must clearly identify such transactions by appropriate designation, clearly document in writing the circumstances surrounding the nature of the error and promptly provide such documentation to the Market Regulation Department upon request.

3. Wrong Side of Market Executions

When an order has been executed on the wrong side of the market and the erroneous execution has been placed in the relevant broker's or firm's error account, the order shall be executed in accordance with its terms, with an adjustment to the customer by check if the order is executed at a worse price as a result of the error or mishandling of the order.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME**
Subject	**Reminder Regarding Giving and Receiving of Gratuities**
Rule References	**Rule 508**
Advisory Date	**August 30, 2021**
Advisory Number	**CME RA2102-2**

As a reminder, CME Rule 508 ("Giving and Receiving of Gratuities") prohibits members, member firms and broker associations and employees of these individuals and entities from giving gifts or gratuities in excess of **$100 per year** to any employee of another member, member firm or broker association. This rule is substantially similar to the restrictions imposed under FINRA Rule 3220 ("Influencing or Rewarding Employees of Others").

The text of CME Rule 508 is set forth below:

508. GIVING AND RECEIVING OF GRATUITIES

A member, member firm, broker association or an employee of any of the foregoing may not give, directly or indirectly, to any employee of another member, member firm or broker association any gratuities or gifts with an aggregate market value in excess of $100 within any twelve-month period.

This rule applies notwithstanding any internal policy of an entity that allows for gifts in excess of $100. The requirements of this rule apply to both the providers and the recipients of such gifts and gratuities.

Questions regarding this advisory may be directed to the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Aaron Smith, Executive Director, Investigations, 312.435.3754

Dawn Massey-Anastasiou, Director, Investigations, 312.341.7608

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchanges	**CME, CBOT, NYMEX & COMEX**
Subject	**CME Globex Operator ID Requirements**
Rule References	**Rule 576**
Advisory Date	**September 2, 2020**
Advisory Number	**CME Group RA2012-5**
Effective Date	**September 17, 2020**

Effective on trade date September 17, 2020, and pending all relevant CFTC regulatory review periods, this Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1902-5 from March 7, 2019. It is being issued to harmonize references to Globex Terminal Operators and the way that such parties are to be identified to the Exchange by replacing references to Tag 50 IDs with "operator ID."

No other material changes have been made to the Advisory Notice.

Rule 576 ("Identification of Globex Terminal Operators") requires that each Globex Terminal Operator be identified to the Exchanges by the submission of a unique operator ID. For CME iLink, operator IDs are issued by an Exchange Clearing Member firm ("Clearing Member") or their contracted vendors or assignees, or in some circumstances, by the CME Group Global Command Center ("GCC").

Clearing Members are responsible for ensuring that all operator IDs are unique at the Clearing Member level and that all non-administrative messages ("messages"), inclusive of orders, sent to Globex are properly submitted with the correct operator ID. Operator IDs are not case sensitive and Clearing Members must ensure that uniqueness is achieved by means other than solely modifying the letter case between different operator IDs (For example, "ABC" and "abc" would be viewed as the same operator ID). Further, all operator IDs must be between 2 and 18 bytes (characters) in length, and the Market Regulation Department ("Market Regulation") strongly encourages the use of alphanumeric characters only. If the operator ID contains non-alphanumeric characters, the only characters permitted are as follows:

_	underscore
-	dash
:	colon
@	(commercial) at
.	period

With respect to accounts that are carried by Clearing Members on a disclosed basis, Clearing Members must provide the identity of the "Individual" or "Team" assigned to each operator ID associated with the Clearing Member immediately upon request by Market Regulation. Clearing Members must maintain or cause to be maintained historical records related to the identity of the "Individual" or "Team" assigned to each operator ID for a minimum of five years.

With respect to omnibus accounts that are carried by a Clearing Member on an undisclosed basis, Clearing Members must be able to either obtain and provide the identity or require the omnibus account to obtain and provide the identity of the "Individual" or "Team" assigned to each operator ID within the undisclosed omnibus account immediately upon request by Market Regulation. Clearing Members must maintain or cause to be maintained historical records related to the "Individual" or "Team" assigned to each operator ID for a minimum of five years. Such historical records need not include the identity of the "Individual" or "Team."

For operator IDs which require registration, it is the responsibility of the Clearing Member to ensure that each operator ID is properly registered in the Exchange Fee System ("EFS"). Registered operator IDs must be identified as either "Individual" or "Team" in EFS, and all registrations must be current and accurate at all times.

The text of Rule 576 is set forth below and is followed by a Frequently Asked Questions ("FAQ") section which begins on page 4.

576. IDENTIFICATION OF GLOBEX TERMINAL OPERATORS

Each Globex Terminal Operator shall be identified to the Exchange, in the manner prescribed by the Exchange, and shall be subject to Exchange rules. If operator IDs are required to be registered with the Exchange, it is the duty of the clearing member to ensure that registration is current and accurate at all times. Each individual must use a unique operator ID to access Globex. In no event may a person enter an order or permit the entry of an order by an individual using an operator ID other than the individual's own unique operator ID.

Required Registration of operator IDs

Registration of operator IDs is required for individual members, employees of individual members, employees or contractors of a Clearing Member, CME and CBOT Rule 106.J. ("Equity Member Firm") and NYMEX and COMEX Rule 106.J. ("Member Firm") firms. Additionally, operator ID registration is required for any other party receiving preferential fees in accordance with other programs offered by any of the Exchanges, unless the terms of a specific program specifically exempt such registration. Additionally, irrespective of whether a party is eligible for preferential fees, Market Regulation or the GCC reserve the right to require the registration of the operator ID of any market participant.

EFS supports the registration of operator IDs that are not otherwise required to be registered if the Clearing Member elects to register the "Individual" or "Team" operator IDs. Trading entities must provide accurate and up-to-date registration information about their "Individual" and "Team" operator IDs to their respective Clearing Members. The operator ID that is registered in EFS must exactly match the operator ID that is submitted on all messages sent to Globex.

For "Team" registrations, EFS allows for the input of the relevant individual registration information for each person on the team, and also requires the designation of each team member's role. Available roles include: Head Trader, Risk Monitor, Technical/Program Manager, Trader and Trading Monitor. Each "Team" must have a Head Trader, typically the most senior person or the person primarily responsible for the "Team's" activities. If there are changes to the composition of the group of persons represented by the "Team" operator ID, it is the responsibility of the trading entity and the Clearing Member to ensure that those changes are promptly and accurately reflected in EFS.

Identification of operator IDs for "Individual"

An operator ID should be identified as an "Individual" if the operator ID meets one of the descriptions below:

- A single person who is a manual trader, which refers to a person who physically submits messages directly into Globex using a front-end system, typically via keyboard, mouse, or touchscreen, and the messages are then routed in their entirety to the match engine at the time of submission.
- A single person who is solely responsible for, and actively monitors at all times, the administration and operation of an Automated Trading System ("ATS"). An ATS refers to a computer system which generates and/or routes messages without human intervention. This includes any messages generated by a computer system or routed using functionality that manages the submission of an order through automated means (i.e. execution algorithm). The person in this role typically initiates or disables particular algorithms or strategies, adjusts the parameters of any

automated program(s), and monitors the live trading of the ATS. All messages must be submitted with the "Individual" operator ID assigned to the person present at the time of operation.

- A single person who engages in a combination of the trading methods described above. The person must ensure that all messages are submitted with the correct manual order indicator to differentiate between manual and automated activities.

Each "Individual" operator ID must represent a single person. Each person is required to submit messages using their own operator ID and may not, under any circumstances, permit another person to enter messages using their operator ID.

Identification of operator IDs for "Team"

An operator ID should be identified as a "Team" if the operator ID represents a group of persons who are simultaneously administering, operating, and monitoring an ATS while it is operational.

Many ATSs are administered, operated, and monitored over the course of multiple shifts throughout a trading cycle. If the makeup of the group of persons is altered at the shift change time, or if a new group of persons takes over the duties of the prior group at the shift change time, a separate unique "Team" operator ID is required for messages submitted to Globex during the new shift. Where registration is required, the group of persons on the new shift must be registered with a unique "Team" operator ID in EFS so that, at any given time, the operator registration accurately identifies the Team actively monitoring the operation of the ATS.

A single operator ID may be used to represent multiple operators only in true ATS Team situations. Entities may not bundle all their ATS operators under one operator ID if certain operators are primarily responsible for different ATSs or for the same ATS on different shifts.

"Team" operator IDs may submit only automated messages to Globex. Should a situation occur where a "Team" needs to submit a manual message (i.e. during maintenance downtime, system malfunction, etc.), the message must be submitted with an "Individual" operator ID assigned to the specific single person submitting the message, rather than the "Team" operator ID associated with the group. In this scenario, a person would be acting in the capacity of an "Individual" manual trader as described above.

Clearing Members must ensure that all operator IDs which require registration are currently and accurately registered in EFS and must make any necessary updates to operator ID registrations promptly. Failure to transmit operator IDs to Globex in accordance with this Advisory Notice may result in disciplinary action and may also result in a reassessment of fees.

Frequently Asked Questions (FAQ)

Identification and Registration of Globex Operator IDs (operator IDs)

1. What is an administrative message?

Administrative messages, which are not subject to the requirements set forth in this Advisory Notice, include the following: Logon, Heartbeat, Test Request, Resend Request, Session Level Reject, Business Level Reject, Sequence Reset, and Logout.

2. Do messages submitted to Globex require the submission of an accurate operator ID?

Yes. All messages other than administrative messages referenced in the answer to Question 1 above must include the unique operator ID of the "Individual" or "Team" submitting such messages to Globex.

3. What is an operator ID?

An operator or Operator ID is a user ID that uniquely identifies a party that accesses and/or submits messages to Globex. operator IDs are issued by exchange Clearing Members, or their contracted vendors or assignees, or in some circumstances, by the GCC.

4. Is the operator ID submitted on a message visible to other market participants?

No. Trading on Globex is anonymous.

5. Rule 576 states that each individual must use a unique user ID to access Globex. Is it permissible for an individual to have multiple operator IDs?

Yes, an individual may have multiple operator IDs. However, each Clearing Member must be able to uniquely identify the individual assigned to a particular operator ID or identify the individuals assigned in the case of a Team operator ID. To the extent an operator ID is issued to a participant trading through an undisclosed omnibus account, the Clearing Member must be able to either obtain and provide the identity or require the omnibus account to obtain and provide the identity of the "Individual" or "Team" assigned to each operator ID within the undisclosed omnibus account upon request by Market Regulation.

6. Are Clearing Members responsible for ensuring that operator IDs are unique at the Clearing Member level?

Yes, all operator IDs must be unique at the Clearing Member level, irrespective of whether the account is carried by the Clearing Member on a disclosed or undisclosed basis.

7. Is there any circumstance in which a person may use the operator ID of another person?

No. Each message submitted to Globex must reflect the operator ID of the person or team of persons who submitted the message or caused the message to be submitted.

8. If a person deploys an ATS and someone else monitors the operation of the ATS during certain hours, does the operator ID of the person monitoring the ATS have to be entered on new messages?

Yes. The operator ID on all messages must be the operator ID of the person responsible for monitoring the operation of the ATS at that time.

9. If a person deploys an ATS that operates for extended time periods, for example during Regular Trading Hours in addition to European and/or Asian trading hours, may that person's operator ID be sent on all messages?

The operator ID on the messages must reflect the person responsible for operating and monitoring the ATS at the time the messages are sent to Globex. To the extent a single individual is responsible for operating and monitoring the ATS over any given timeframe (e.g. more than one trading session or more than a typical work shift), the individual's operator ID is required to be submitted on all messages. However, upon request, the individual must be able to demonstrate an effective means to monitor the ATS during all times it is operating. During the times that a person is not actively either operating or monitoring the trading operation of the ATS, their name should not be reflected on the active operator.

10. If a trader enters manual messages but also uses automated spreading functionality, may all of those messages be submitted under a single operator ID?

Yes, in this situation, a single operator ID may be used for both manual and automated messages. The manual order indicator value submitted with each message must appropriately identify whether the message was submitted via automated or manual means.

11. What is a "Team operator ID"?

If multiple individuals simultaneously work together to operate or monitor the operation of an ATS, they may be assigned a single operator ID, called a Team operator ID, which represents all of the individuals on the team. The registration process in EFS for a Team operator ID allows a firm to identify the role of each particular individual on the team, for example, Head Trader, Trader, Risk Monitor, Trading Monitor, Technical/Programmer, or Other. Each Team operator must have a Head Trader.

12. May a single Team operator be used for an ATS that operates for extended time periods, for example during Regular Trading Hours as well as European and Asian trading hours?

No, because individuals on a Team operator must be simultaneously working together, and it is expected that the Team operator ID submitted on messages will change as team members' shifts change. For example, if a new team or a team with a different composition takes over the operation of an ATS during European or Asian trading hours, or any other time period or shift, then that new team's Team operator ID must be used for all messages submitted during that period.

13. If a person is financially responsible for, and makes or oversees decisions related to an ATS, may that person be listed as the Head Trader on the Team operator ID for every shift during which the ATS operates?

No. The Team operator ID must represent the team simultaneously working together to operate or monitor the operation of an ATS at any given point in time.

14. If a person is working in a risk management function for a trading entity and as part of the risk function reviews and monitors the multiple ATSs that the entity is operating, does that risk person need to be identified via a Team operator ID?

No, risk managers that are reviewing overall firm exposures and that are separate from the trading function are not required to be identified on a Team operator ID. However, if the risk manager were to manually intervene with the ATS they would need to do so using their own unique operator ID.

15. If a member of a Team that monitors the operation of an ATS needs to submit manual messages, should the Team operator ID be submitted on those messages?

No. The Team operator ID may be used only for messages that are generated from the ATS. To the extent the team needs to submit manual messages, the individual operator ID of the person who manually submits the message must be used.

16. Is there a limit on the number of ATSs an entity or individual may operate?

There is no limit to the number of ATSs an entity or individual can operate, subject to their ability to effectively monitor the operation of the ATSs.

If you have questions on the Exchange fees applicable to an ATS operator, please contact the Fee System Hotline at 312.648.5470 or via email at efsadmin@cmegroup.com.

17. What information is required when registering an operator ID?

Information related to operator ID registration is available in the Exchange Fee System (EFS) User Manual available at www.cmegroup.com.

18. What types of violations related to operator IDs will Market Regulation seek to identify?

Market Regulation's review of operator IDs will be focused on, but not be limited, identifying the following types of violations:

- Missing or Inaccurate Registration
- Non-Identifiable Operators
- Invalid Use of Operator ID
- Invalid Operator ID Format
- Inaccurate Manual Order Indicator Submission

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

Betsy Schneider, Manager, Data Investigations, 312.341.3343

Laetizia Moreau, Executive Director, Data Investigations, 312.435.3619

Andrew Carr, Manager, Data Investigations, 312.435.3610

Lou Abarcar, Data Investigations Architect, Data Investigations, 312.341.3236

For fee-related questions or for general assistance with the fee system, please contact the Fee System Hotline at 312.648.5470 or send an email to efsadmin@cmegroup.com.

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Consent to Exchange Jurisdiction**
Rule References	**Rule 418**
Advisory Date	**January 17, 2020**
Advisory Number	**CME Group RA2001-5**
Effective Date	**February 3, 2020**

Effective on trade date Monday, February 3, 2020, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1909-5 from December 17, 2019. It is being issued to adopt a provision subjecting any intermediary that charges a commission or fee who may not otherwise be involved in a client's trade flow to the jurisdiction of the Exchanges. The same or similar provision will be adopted by all U.S. designated contract markets ("DCMs"), and results from an industry-wide effort to ensure that DCMs have full jurisdiction over such entities where a commission or fee is charged in connection with a client's trading activities in the applicable DCM's markets.[1]

On August 20, 2012, CFTC Regulation 38.151(a) became effective. CFTC Regulation 38.151(a) is set forth below.

> **§38.151 Access requirements.**
>
> (a) *Jurisdiction.* Prior to granting any member or market participant access to its markets, a designated contract market must require that the member or market participant consent to its jurisdiction.

In response to CFTC Regulation 38.151(a), CME, CBOT, NYMEX and COMEX adopted Rule 418 ("Consent to Exchange Jurisdiction"), which also became effective on August 20, 2012. The text of Rule 418 is set forth below:

> **418. CONSENT TO EXCHANGE JURISDICTION**
>
> Any Person initiating or executing a transaction on or subject to the Rules of the Exchange directly or through an intermediary, and any Person for whose benefit such a transaction has been initiated or executed, expressly consents to the jurisdiction of the Exchange and agrees to be bound by and comply with the Rules of the Exchange in relation to such transactions, including, but not limited to, rules requiring cooperation and participation in investigatory and disciplinary processes. Any futures commission merchant, introducing broker, associated person, or foreign Person performing a similar role that charges a commission or fee in connection with transactions on or subject to the Rules of the Exchange also expressly consent to the Exchange's jurisdiction.

All market participants and intermediaries are reminded that failure to fully cooperate and participate in any CME Group Market Regulation Department investigation or disciplinary enforcement matter may result in charges being issued for a violation of Rule 432.L. pursuant to the provisions of Rule 406 ("Issuance of Charges"). Rule 432.L. is set forth below:

> **432. GENERAL OFFENSES**
>
> It shall be an offense:

[1] Please see Special Executive Report S-8518 from January 17, 2020, for additional information.

L. 1. to fail to appear before the Board, Exchange staff or any investigative or hearing committee at a duly convened hearing, scheduled staff interview or in connection with any investigation;

2. to fail to fully answer all questions or produce all books and records at such hearing or in connection with any investigation, or to make false statements;

3. to fail to produce any books or records requested by duly authorized Exchange staff, in the format and medium specified in the request, within 10 days after such request is made or such shorter period of time as determined by the Market Regulation Department in exigent circumstances;

Sanctions for violations of Rule 432 may include monetary penalties and/or restrictions or denial of access to any or all products of any Designated Contract Market, Derivatives Clearing Organization, or Swap Execution Facility owned or controlled by CME Group.

Market participants and intermediaries are reminded that access to CME, CBOT, NYMEX and COMEX markets is conditioned on compliance with Rule 418. Market participants and intermediaries should be aware that refusal to cooperate or provide requested information based on privacy or other applicable laws of any foreign jurisdiction will in no manner affect the Market Regulation Department's forwarding of the matter for the issuance of charges pursuant to the provisions of Rule 406 for a violation of rule 432.L or any other applicable Rule.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Steve Schweitzer, Executive Director, Enforcement, 312.435.3648

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Supervisory Responsibilities for Employees and Agents**
Rule References	**Rules 418, 432.W., 433, 444, 501 and 574**
Advisory Date	**July 1, 2024**
Advisory Number	**CME Group RA2403-5**
Effective Date	**July 16, 2024**

Effective on trade date July 16, 2024, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2114-5 from August 30, 2021. It is being issued to provide additional guidance on how parties must discharge their supervisory duties, and the factors Market Regulation will consider when assessing a potential violation of Rule 432.W. This Advisory Notice also establishes a new Frequently Asked Question section.

Pursuant to Rule 432.W. ("General Offenses"), it is an offense for any party to fail to diligently supervise its employees and agents in the conduct of their business relating to the CME Group Exchanges. For the avoidance of doubt, agents include any automated trading system ("ATS"), both fully- and semi-automated, operated by the party. Additionally, pursuant to Rule 433 ("Strict Liability for the Acts of Agents"), parties are strictly liable for the acts, omissions, or failures of any officials, agents or employees acting for the party within the scope of their employment or office.

All parties subject to the jurisdiction of the Exchange pursuant to Rule 418 ("Consent to Exchange Jurisdiction") must take reasonable measures to prevent violations of Exchange rules. Such parties have a duty to develop and diligently enforce supervisory programs that are reasonably designed to detect and deter violations of Exchange rules. The supervisory programs must be commensurate with the party's business model, organizational structure, geographical coverage, and other factors including the size and complexity of the party's Exchange-related activities.

The pertinent text of Rules 432.W. is set forth below.

CME, CBOT, and NYMEX/COMEX

432. GENERAL OFFENSES

It shall be an offense:

W. for any party to fail to diligently supervise its employees and agents in the conduct of their business relating to the Exchange;

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Trenton Crawford, Senior Specialist, Rules & Regulatory Outreach, 312.307.9006

Aaron Smith, Executive Director, Investigations, 312.435.3754

Natalie Petric, Director, Enforcement Counsel, 312.435.3496

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

FAQ Related to Supervisory Responsibilities

Q1: What does Market Regulation consider in assessing whether a party failed to diligently supervise its employee or agent?

A1: In assessing whether a party failed to diligently supervise its employees or agents, Market Regulation expects that all parties, at a minimum, endeavor to take reasonable measures designed to prevent rule violations from occurring; take reasonable measures to detect violative conduct should it occur; and take reasonable corrective action to address identified instances of noncompliance. Market Regulation will consider, among other things, the size and nature of a party's Exchange-related business when assessing the party's supervisory program.

Market Regulation has taken disciplinary actions on supervisory failures including, but not limited to, the failure to diligently, adequately, effectively, or sufficiently:

- supervise employees and agents in a manner to ensure conduct was consistent with Exchange rules
- provide training to employees designed to prevent potential violation of Exchange rules
- take remedial action when aware of conduct inconsistent with Exchange rules either through independent identification or through notice from the Exchange, including through Exchange inquiries, letters of warning, summary fines, or administrative surcharges
- proactively monitor employees' market activity for potential violation of Exchange rules
- monitor employees' market activity after having been notified or alerted of potential conduct inconsistent with Exchange rules
- impose measures designed to prevent violations after having been notified or alerted of potential conduct inconsistent with Exchange rules
- implement policies and procedures regarding the monitoring, detection, and evaluation of account change requests
- enforce or follow internal policies or procedures
- have a process in place designed to prevent a suspended trader/customer from accessing Exchange markets
- monitor an employee's personal trading activity while also permitting the employee to handle customer orders
- ensure complete, accurate, and timely responses are provided to Market Regulation, including responsive information provided by outside counsel
- have supervisory procedures pertaining to the creation, maintenance, and monitoring of Globex Operator IDs assigned to clients, including clients within omnibus account structures
- perform testing and simulation of an ATS prior to deploying it into the market
- correct known issues with an ATS prior to deploying it into the market
- implement internal controls or alerts to inform and/or or stop noncompliant behavior from an ATS
- monitor an ATS or allowing it to operate unattended
- prevent a trader from manually overriding safeguards that had disabled an ATS
- adhere to existing policies and procedures when deploying an ATS that ultimately experienced a malfunction
- have processes designed to prevent re-deploying an ATS that experienced a malfunction without determining and remediating the root cause

Q2: What are reasonable supervisory measures to prevent rule violations from occurring?

A2: Reasonable measures to prevent rule violations include, but are not limited to, training employees and agents involved in Exchange-related activities on Exchange-specific rules, rule amendments,

Market Regulation Advisory Notices, Special Executive Reports, and Notices of Disciplinary Action; maintaining records of attendance logs for such training; and maintaining records of communications to employees and agents that contain training on Exchange rules. Although having standing policies requiring compliance with Exchange rules is useful, such policies alone, in and of themselves, do not reasonably prevent rule violations from occurring. As such, Market Regulation expects parties engaged in specific Exchange-related activities to also be trained on the Exchange-specific rules. For instance, a party engaged in block trading should be trained specifically on Exchange block trading rules, advisories, and notices. Further, to the extent the party engages in block trading across different product groups, the party should receive training on differences between the rules pertinent to those products, such as block reporting time requirements that may differ between products. Supervisors of those parties should similarly be trained.

Further, while training on all Exchange rules pertinent to the party's market activity is expected at minimum, additional training based on observations from the party's own compliance monitoring and inquiries from regulators may be warranted.

Q3: What are reasonable supervisory measures to detect rule violations?

A3: Market Regulation understands that the reasonableness of any surveillance program will depend on the size and nature of a party's Exchange activity. Market Regulation will consider the type, substance, and breadth of surveillance and/or monitoring program(s) employed, as well as its success in identifying violative conduct. In assessing the success of monitoring and/or surveillance programs, Market Regulation will examine items such as the duration of violative conduct and the scope and breadth of the conduct (e.g., the number of employees or agents involved, their responsibilities in the firm and role in the conduct). Market Regulation will also consider if a party learned of the potentially violative activity through its own surveillance and monitoring, or whether it was first notified of the activity by Market Regulation or other regulatory agencies.

Q4: What are reasonable corrective actions to address identified instances of noncompliance?

A4: Market Regulation considers reasonable corrective action to address identified instances of noncompliance within the greater context of the noncompliant or potentially violative activity. Market Regulation will examine measures taken by a party to ensure that the violative, noncompliant conduct does not recur. This may include substantive changes to the subject trading strategy, surveillance and/or monitoring systems if applicable, enhanced training and education of employees, substantive staff changes that address the type of noncompliance, and internal disciplinary action against those involved in violative activity. Market Regulation will take a holistic view of the efforts taken to address the potentially violative or noncompliant activity. Additionally, Market Regulation may consider the lack of recurrence of violative or noncompliant activity as evidence that the corrective action was sufficient. Conversely, Market Regulation may consider the recurrence of violative or noncompliant activity as evidence that the corrective supervisory action was not sufficient.

Q5: Does a party's obligation to diligently supervise require the employment of compliance staff?

A5: Market Regulation will consider the size and nature of activity of the firm, and expect corresponding resources dedicated to their supervisory and compliance activities. Notwithstanding the forgoing, all parties are required to diligently supervise their employees and agents.

Q6: Who is considered an "agent" in the context of Rule 432.W. and this Advisory Notice?

A6: Market Regulation may consider a party's third-party vendors, outside counsel, and other persons acting for the party within the scope of their employment or office to be agents for the purpose of this rule. Market Regulation also considers an ATS to be the agent of the party operating the ATS.

Q7: What are the additional supervisory responsibilities of parties operating ATSs?

A7: Any party engaged in automated trading on or subject to the rules of the Exchange is required to monitor and supervise the activity of the ATS or strategy while in operation and shall take immediate and reasonable corrective action in the event of a disruption or any violative, or potentially violative, activity associated with the ATS.

To the extent a party develops, designs, or has the ability to modify the functionality or operation of an ATS or strategy, that party must take reasonable steps to prevent and mitigate the risk the ATS or strategy may cause a market disruption, or disrupt the systems of the Exchange or other market participants. Parties engaged in automated trading must also take reasonable steps to prevent rule violations and remediate any issues.

Q8: Would a party be expected to apply varying levels of supervision to systems that utilize more sophisticated technology?

A8: Regardless of the technology used in an ATS, parties must have in place adequate supervisory processes and controls, in addition to risk controls. It may be necessary for these processes and controls to be tailored to specific technologies used by the system or strategy. Through these processes and controls, a party must be able to trace and reconstruct the decisions made or actions taken by the system regardless of the technology in use, which, at the discretion of the party, may require enhanced supervision to comply with Exchange rules.

Q9: What are the supervisory responsibilities of an intermediary, including clearing member firms, futures commission merchants, introducing brokers, and foreign brokers, if their client or prospective client is the subject of a disciplinary action that suspends or bars them from CME Group markets?

A9: Exchange Rule 435., which applies to all parties subject to the jurisdiction of the Exchange under Rule 418, provides that a suspended or expelled party shall not be entitled to any of the privileges of membership during the period of such suspension or expulsion, including, but not limited to, the right to direct and indirect access to any Designated Contract Market, Derivatives Clearing Organization or Swap Execution Facility owned or controlled by CME Group. Exchange Rule 432.S. similarly provides that it is a violation of Exchange rules to fail to comply with an order of the Board, Exchange staff or any hearing committee.

Upon receiving notice from the Exchange that a party has been suspended or barred from CME Group markets, intermediaries are expected to take appropriate action consistent with the notice, including terminating or causing to be terminated the subject party's access to CME Group markets. Intermediaries should have appropriate supervisory procedures and controls to ensure suspended or barred participants are not permitted to access CME Group markets. With respect to omnibus accounts carried by a clearing member firm on an undisclosed basis, a clearing member firm should have appropriate policies, procedures, and controls to ensure the clearing member firm's omnibus client does not permit a customer within the omnibus account to access CME Group markets in contravention to a notice from the Exchange.

As a reminder, Exchange Rule 576 and its associated Market Regulation Advisory Notice provide that a clearing member firm must be able to either obtain and provide the identity or require the

omnibus client to obtain and provide the identity of a person assigned to each Globex Operator ID within the undisclosed omnibus account immediately upon request by Market Regulation. The failure or inability to do so may give rise to a violation of Rule 432.W.

To the extent an intermediary has a current or prospective client whose name or identity potentially matches that of a suspended or barred party, the intermediary is encouraged to take further steps to verify the standing of their client or prospective client, including contacting the Market Regulation Department for additional information concerning the subject party.

Q10: Are there additional supervisory responsibilities for parties who provide access to CME Group markets?

A10: Exchange Rule 418 provides that any futures commission merchant, introducing broker, associated person, or foreign Person performing a similar role that charges a commission or fee in connection with transactions on or subject to the rules of the Exchange is subject to the Exchange's jurisdiction. While Rule 432.W. does not require these parties, or intermediaries more generally, to supervise or monitor the trading activity of their customers, these parties must nevertheless take reasonable measures to prevent violations of Exchange rules when on notice that their customer may have violated an Exchange rule. Failure to take any reasonable measures may result in disciplinary action.

Q11: What are the supervisory expectations when a firm receives an inquiry letter?

A11: Market Regulation routinely sends inquiry letters to market participants. Parties are expected to respond to an inquiry letter in a complete, accurate, and timely manner. Additionally, parties involved in collecting the responses (e.g., clearing firms, introducing brokers, foreign brokers, etc.) are expected to take measures to ensure that the responses are complete. Additionally, parties are reminded that pursuant to Rule 574 ("Globex Access Restrictions"), if a clearing member has actual or constructive notice of a violation of Exchange rules in connection with the use of Globex by any Person for which it has authorized a direct connection and the clearing member fails to take appropriate action, the clearing member may be found to have committed an act detrimental to the interest or welfare of the Exchange.

Q12: What are the supervisory responsibilities of members with employees who have been granted access to the CME trading floor?

A12: Pursuant to CME Rule 501 ("Employees of Members"), Members, who have registered with the Exchange persons whom they employ on the trading floor, are responsible for ensuring that their registered employees comply with all exchange rules. This supervisory duty applies even if the employee also works for other Members on the trading floor.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Illegal Money Passing Between Accounts**
Rule References	**Rule 432**
Advisory Date	**April 27, 2011**
Advisory Number	**CME Group RA1101-5**

On November 29, 2010, CME, CBOT, NYMEX and COMEX implemented amended Rule 432 ("General Offenses") to provide additional clarity that it is an offense for market participants to prearrange the execution of transactions for the purpose of passing money between accounts (see SER-5481 from November 18, 2010). This prohibition applies to transactions executed on CME Group exchanges' competitive venues as well as to transactions that are bilaterally negotiated and submitted to CME Clearing.

All transactions executed on exchange markets that are submitted for clearing must be made in good faith for the purpose of executing bona fide transactions, and prearranged trades intended to effectuate a transfer of funds from one account to another are explicitly prohibited. Paired, round turn transactions between counterparties which show indicia that the trades were prearranged for the purpose of transferring equity between accounts will be reviewed by Market Regulation and violations of Rule 432.G. will result in disciplinary action.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Trenton Crawford, Senior Specialist, Rules & Regulatory Outreach, 312.307.9006

Aaron Smith, Executive Director, Investigations, 312.435.3754

Joshua Abrons, Manager, Investigations, 312.341.3042

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Summary Fines for Reporting Infractions**
Rule References	**Rule 512**
Advisory Date	**October 10, 2022**
Advisory Number	**CME Group RA2206-5**
Effective Date	**October 25, 2022**

Effective on trade date Tuesday, October 25, 2022, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2007-5 from September 2, 2020. It is being issued to add "requests for a bona fide hedge exemption" to the list of types of submission or reporting requirements that may result in summary fines pursuant to Rule 512 ("Reporting Infractions").

No substantive information in this Advisory Notice has been amended.

Rule 512 ("Reporting Infractions") requires that all data, records and other information required to be reported to the Exchanges or CME Clearing be submitted in an accurate, complete and timely manner. The Rule authorizes the Chief Regulatory Officer or their designee to issue summary fines based on the inaccurate, incomplete or untimely submission of data or records. The summary fines may not be less than $1,000 or in excess of $5,000 per offense for individuals or $10,000 per offense for firms or facilities.

Infractions subject to sanctions under Rule 512 include, but are not limited to, deficiencies related to the following types of submission or reporting requirements:

- Reporting concerning large trader, open interest and long positions eligible for delivery
- Registrar reports
- Block trade and EFRP reporting
- Operator IDs on CME Globex trades
- Manual order indicator on CME Globex trades
- Sender location on CME Globex trades
- CTI (customer type indicator) codes
- Front-end audit trail requirements
- Reporting related to accounts, including suspense account usage, account changes, and transfer reason codes
- CME Brokerage Reassignment ("BK") trade recordation requirements (please see Special Executive Report S-7611 from March 4, 2016, for information on BK Trades)
- Requests for a bona fide hedge exemption

The Department will continue, in its discretion, to issue warning letters for a first offense. However, consistent with CFTC regulations for designated contract markets, no more than one warning letter will be issued to an individual or entity for the same offense within a rolling 12-month period. Factors affecting the amount of the sanction under Rule 512 will include the magnitude, frequency and impact of the reporting infraction, the party's prior disciplinary history for similar infractions and remedial actions taken to correct the identified reporting issues. The Department, in its discretion, may refer matters that it deems egregious to the Chief Regulatory Officer for consideration of charges pursuant to the provisions of Rule 406 ("Issuance of Charges").

Rule 512 will allow parties 15 calendar days following the receipt of a summary fine to present evidence to the Department demonstrating that the fine should be rescinded or reduced. The Rule also allows parties to appeal the Department's determination that the evidence submitted was insufficient to warrant a

rescission or reduction in the summary fine to the BCC if the party provides evidence of a valid basis for the appeal as set forth in the rule.

A summary fine issued pursuant to the provisions of Rule 512 constitutes a formal Exchange disciplinary action which requires the Exchange to report the matter to the CFTC pursuant to CFTC Regulation 9.11(a), and to enter the disciplinary action into the National Futures Association Basic System. Individuals and firms will not be subject to both a fine under Rule 512 and a surcharge levied by CME Clearing pursuant to Rule 852 ("Surcharges for Errors, Delays and Omissions") based on the same underlying activity.

The texts of Rules 512 and 852 appear below.

512. REPORTING INFRACTIONS

512.A. General

All data, records and other information required by the rules to be reported to the Exchange or the Clearing House, as applicable, must be submitted in an accurate, complete and timely manner.

512.B. Sanctions

1. Except as otherwise provided in Rule 536, the Chief Regulatory Officer or their designee shall have the authority to impose summary fines on parties who have consented to the jurisdiction of the Exchange. Summary fines shall not be less than $1,000 per offense and shall not exceed $5,000 per offense for individuals or $10,000 per offense for firms for the inaccurate, incomplete or untimely submission of data, records or information required to be submitted to the Exchange or the Clearing House.
2. Individuals and firms shall have 15 days following receipt of the notice of a summary fine to present evidence to the Market Regulation Department that the fine should be rescinded or reduced. Absent the submission of such evidence within the designated time period, the fine shall be deemed final and may not be appealed.

512.C. Hearings and Appeals

If the Chief Regulatory Officer or their designee determines that evidence submitted by an individual or firm pursuant to Section B.2. is insufficient to support the requested rescission or reduction of the fine, the individual or firm may, within 10 days of the decision, file a written appeal with the Market Regulation Department. A written appeal that fails to specify the grounds for the appeal and the specific error or impropriety of the original decision shall be dismissed. The appeal shall be heard by a Panel of the Business Conduct Committee ("BCC Panel") whose decision shall be final. The appellant shall be entitled to be represented by counsel, appear personally before the BCC Panel and present evidence that they may have in support of their appeal. The BCC Panel shall not set aside, modify or amend the appealed decision unless it determines, by a majority vote, that the decision was:

1. Arbitrary, capricious, or an abuse of the Exchange staff's discretion;

2. In excess of the Exchange staff's authority or jurisdiction; or

3. Based on a clearly erroneous application of Exchange rules.

Notwithstanding the provisions of Sections B.1. and B.2. above, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Chief Regulatory Officer for consideration of charges.

852. SURCHARGES FOR ERRORS, DELAYS AND OMISSIONS

Exchange staff may establish, and from time to time revise, schedules of surcharges to be imposed upon clearing members for errors, delays and omissions with respect to trade data and certain other information required to be provided to the Clearing House. These surcharges are to be collected by the Clearing House and are in addition to any disciplinary sanctions that may be imposed by Market Regulation, the BCC or CHRC for the violation of Exchange rules.

Questions regarding this Advisory Notice may be directed to one of the following individuals in the Market Regulation Department:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

For media inquiries concerning this Market Regulation Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**TAS, TAM, BTIC, TACO, and TMAC Transactions**
Rule References	**Rule 524**
Advisory Date	**July 13, 2023**
Advisory Number	**CME Group RA2302-5**
Effective Date	**July 31, 2023**

Effective on trade date July 31, 2023, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2301-5 from June 1, 2023. It is being issued in connection with the adoption of CME and CBOT Rule.524.D. ("Trade Marker at Close ('TMAC') Transactions"). The new TMAC transaction type will allow market participants to trade certain equity index futures contracts at the current day's applicable marker price, or at any valid price increment up to four ticks higher or lower than the marker. (See SER-9219)

The marker price for TMAC transactions will be derived from the volume-weighted average price ("VWAP") of outright transactions in the underlying instrument executed on CME Globex electronic trading platform ("CME Globex") in the 30-second window ending at 4:00 p.m. Eastern Prevailing Time ("EPT"). Trading activity in this 30-second window is also used by the Exchanges for purposes of calculating reference prices known as the Fixing Prices for the respective instruments. The daily TMAC marker price for each eligible instrument will therefore equal the Fixing Price, published by the Exchanges and made available on the CME Group website.

No other substantive changes have been made to this Advisory Notice.

Information on the specific products, contract months and spreads eligible for pricing as TAS, TAM, BTIC, TACO, or TMAC transactions is contained in the Trading at Settlement ("TAS") Table set forth in the Interpretations & Special Notices Section at the end of Chapter 5 of each Exchange's Rulebook. The table may also be accessed here.

TAS, TAM, BTIC, TACO, and TMAC transactions are subject to the information contained in the Advisory Notice, each Exchange's Rule 524, and, for BTIC, TACO, and TMAC transactions, provisions contained in applicable CME and CBOT futures product chapters. The text of each Exchange's Rule 524 appears in Section 6 of this Advisory Notice.

1. General Information on TAS, TAM, BTIC, TACO, and TMAC Transactions

TAS permits parties to trade at a differential to the current day's not-yet-known futures settlement price. TAM and TMAC permit parties to trade at a differential to the current day's not-yet-known Exchange-determined marker price.

Orders for CME and CBOT TAS and TMAC-eligible futures products may be entered into CME Globex for execution at the current day's settlement price, marker price, or any valid price increment up to four ticks higher or lower than the settlement price.

CME and CBOT TAS and TMAC-eligible futures products may also be executed as block trades, EFPs, or EFRs and priced at the current day's settlement price, marker price, or any valid price increment up to four ticks higher or lower than the settlement price.

Orders for NYMEX and COMEX TAS- and TAM-eligible futures products may be entered into CME Globex for execution at the current day's settlement or marker price, as applicable, or any valid price increment ten ticks higher or lower than the applicable settlement or marker price, except for spot month Copper futures which may be executed on CME Globex and priced solely at the settlement price, or TAS flat.

NYMEX and COMEX TAS- and TAM-eligible futures products may also be executed as block trades, EFPs, or EFRs and priced at the settlement or marker price, as applicable, or any valid price increment ten ticks higher or lower than the settlement or marker price, except for spot month Copper futures block trades, EFPs, and EFRs which may be priced solely at the settlement price, or TAS flat.

BTIC permits parties to trade at a differential (basis) to an eligible futures contract's underlying cash Index or a related index as described in the product chapter in which the closing level is not-yet-known.

TACO permits parties to trade at a differential (basis) to an eligible futures contract's underlying cash Index special opening quotation ("SOQ"), which is not-yet-known.

Orders for certain CME and CBOT futures products may be entered into CME Globex for execution at the current day's eligible closing price or any fair and reasonable basis above or below the current day's eligible closing price.

Certain CME and CBOT futures products may be executed as a block trade and priced at the underlying futures contracts' eligible closing price or at a differential (basis) to the cash Index, or a related index as described in the product chapter, closing price.

Orders for CME E-mini S&P 500 futures may be entered into CME Globex or executed as a block trade for pricing at the next following regularly scheduled SOQ or any fair and reasonable basis above or below the next following regularly scheduled SOQ.

The basis must be stated in admissible futures price increments for the specific futures contract. In the case of a BTIC or TACO block trade, the negotiated basis must be fair and reasonable in light of factors including, but not limited to, financing rates, expected dividend income, and time remaining until the underlying futures contract expiration.

Information on products eligible to be executed as block trades and priced as TAS, TAM, BTIC, TACO, or TMAC transactions may be found here:

http://www.cmegroup.com/clearing/trading-practices/block-trades.html

2. Regulatory Considerations

All market participants are reminded that any trading activity that is intended to disrupt orderly trading or to manipulate or attempt to manipulate prices to benefit a TAS, TAM, BTIC, TACO, or TMAC position, including a position established as a block trade, will subject the member and/or the market participant to disciplinary action for any of a number of rule violations, including, but not limited to:

- price manipulation or attempted price manipulation
- wash trading

- conduct detrimental to the interest or welfare of the Exchange or conduct which tends to impair the dignity or good name of the Exchange
- engaging in conduct inconsistent with just and equitable principles of trade

Investigation of suspected manipulative or disruptive activity related to TAS, TAM, BTIC, TACO, or TMAC or activity in the related underlying markets will include the Market Regulation Department's ("Department") review of positions and trading activity in the applicable Exchange markets and any related markets to determine if such activity was disruptive, collusive, and/or caused or attempted to cause aberrant price movement during these periods. Pursuant to Rule 432.L.3, market participants are reminded that it is an offense to fail to produce any books or records requested by authorized Exchange staff within 10 days after such request is made or such shorter period of time as determined by the Exchange in exigent circumstances. The Department always has the authority to request books and records as well as other relevant information regarding the nature of a participant's trading and positions in Exchange products and in any related markets as part of its regulatory program.

3. Entry of TAS, TAM, BTIC, TACO, and TMAC Orders on CME Globex

Rule 524 permits the initiation of TAS, TAM, BTIC, TACO, and TMAC orders into CME Globex only subsequent to the beginning of each group's pre-open state and during the time period the applicable contracts are available for TAS, TAM, BTIC, TACO, or TMAC trading on CME Globex, as applicable. The initiation of any TAS, TAM, BTIC, TACO or TMAC order on CME Globex outside of these time periods is strictly prohibited.

Market participants are reminded that the timing of each groups' pre-open state may be randomized, as described in the Client Systems Wiki, available here.

Any market participant who initiates the entry of a TAS, TAM, BTIC, TACO or TMAC order prior to receipt of the security status message indicating that the market has transitioned to the pre-open will be subject to disciplinary action by a panel of the Business Conduct Committee, notwithstanding that the order may have been rejected by the CME Globex system. Sanctions for noncompliance may include a fine, disgorgement of any profits realized as a result of any orders accepted by CME Globex which were initiated prior to receipt of the security status message and/or a suspension of access to the market. Market participants must have appropriate protocols in place to ensure that TAS, TAM, BTIC, TACO, and TMAC orders are not initiated prior to receipt of the security status message.

4. TAS and TAM Calendar Spreads

As set forth in the TAS Table, certain intra-commodity calendar spreads are permitted to be entered into CME Globex and priced at the settlement or marker price, or a specified number of ticks above or below the settlement or marker price.

Additionally, certain NYMEX and COMEX intra-commodity calendar spreads are permitted to be executed as block trades and priced at the settlement or marker price or at a positive or negative differential.

TAS and TAM spread trades may be executed at zero or at a positive or negative differential (positive/negative 1 through positive/negative 10 for eligible NYMEX and COMEX products) (positive/negative 1 through positive/negative 4 for eligible CME and CBOT products) on CME Globex or, where allowable, as block trades. For more information regarding leg price assignment on Globex see the Client Systems Wiki, available here.

5. TAS, BTIC, and TACO Pricing and Daily Price Limits

Notwithstanding that CME Live Cattle, Feeder Cattle and Lean Hogs futures and CBOT Corn, Soybean, Soybean Oil, Soybean Meal, Wheat and KC HRW Wheat futures are subject to daily price limits, market participants executing a trade in one of those products which is priced at a tick increment above or below the settlement price (negative 4 through negative 1 or positive 1 through positive 4) may result in a final trade price above or below the daily price limit.

Similarly, BTIC and TACO transactions may result in an assigned futures price outside of the applicable futures daily price limits.

6. Text of CME, CBOT, and NYMEX/COMEX Rule 524

CME and CBOT

524. TRADING AT SETTLEMENT ("TAS"), BASIS TRADE AT INDEX CLOSE ("BTIC") AND BASIS TRADE AT CASH OPEN ("TACO") TRANSACTIONS

The Exchange shall determine the products, contract months and time periods during which TAS, BTIC, and TACO transactions shall be permitted. Specific products, contract months and spreads eligible for pricing as TAS, BTIC, or TACO transactions are set forth in the TAS Table ("Table") at the end of Chapter 5.

524.A. Trading at Settlement ("TAS") Transactions

The following shall govern TAS transactions:

1. A TAS order may be entered on Globex at any time the applicable contract is available for TAS trading on Globex and during such TAS-eligible contract's prescribed pre-open time period. The initiation of any TAS order on Globex outside these time periods is prohibited.

2. Unless otherwise specified in the Table, a TAS-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526 or as an Exchange of Futures for Physical ("EFP") or Exchange of Futures for Risk ("EFR") transaction pursuant to the requirements of Rule 538.

3. Unless otherwise specified by the Exchange, a TAS transaction may be executed at the current day's settlement price or at any valid price increment four ticks higher or lower than the settlement price.

524.B. Basis Trade at Index Close ("BTIC") Transactions

A Basis Trade at Index Close ("BTIC") transaction is an Exchange futures transaction which is priced with reference to the closing level of such futures contract's underlying cash Index, or the closing level of a related index as described in the applicable product chapter, on a particular trading day (the "Basis"). The following shall govern BTIC transactions:

1. A BTIC order may be entered on Globex at any time the applicable futures contract is available for BTIC trading on Globex and during such BTIC-eligible futures contract's prescribed pre-open time period. The initiation of any BTIC order on Globex outside these time periods is prohibited.

2. Unless otherwise specified in the Table, a BTIC-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526, except that a BTIC block trade cannot be executed on the last day of trading in an expiring BTIC-eligible futures contract.

3. The Basis established in any BTIC transaction must be stated in admissible price increments for the applicable futures contract as set forth in the applicable product chapter. The assigned futures price corresponding to such BTIC transaction shall be the closing level of the applicable cash Index, or the closing level of a related index as described in the applicable product chapter, for that trading day adjusted by the Basis established in such BTIC transaction. For any BTIC-eligible futures contract, the magnitude of the Basis in a BTIC block trade must be fair and reasonable in light of factors including, but not limited to, financing rates, expected dividend income, and time remaining until the underlying futures contract expiration. A BTIC futures transaction may result in an assigned futures price outside of applicable daily price limits. The assigned futures price is deemed final when determined by the Exchange, absent an index price correction by the index provider. If the closing level of a cash Index, or the closing level of a related index as described in the applicable product chapter, is corrected by the applicable cash Index provider prior to 4:00 p.m. CT on the following Business Day, the assigned futures price corresponding to such BTIC transaction shall be amended using the corrected closing level of the applicable cash Index, or the closing level of a related index as described in the applicable product chapter, adjusted by the Basis established in such BTIC transaction, and the assigned futures price shall be deemed final at that time.

4. Additional product-specific BTIC provisions, including those relating to disruptions in the publication of an index and the applicable index closing times are set forth in the applicable product chapter in the Rulebook.

524.C. Basis Trade at Cash Open ("TACO") Transactions

A Basis Trade at Cash Open ("TACO") transaction is an Exchange futures transaction that is priced with reference to the next following regularly scheduled special opening quotation ("SOQ") of such futures contract's underlying cash Index (the "Basis"). The following shall govern TACO transactions:

1. A TACO order may be entered on Globex at any time the applicable contract is available for TACO trading on Globex and during such TACO-eligible contract's prescribed pre-open time period. The initiation of any TACO order on Globex outside these time periods is prohibited.
2. Unless otherwise specified in the Table, a TACO-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526, provided that for any expiring TACO-eligible contract, a TACO block trade is prohibited with reference to such contract's cash Index SOQ for the last day of trading in such contract.
3. The Basis established in any TACO transaction must be stated in admissible price increments for the applicable futures contract as set forth in the applicable product chapter. The assigned futures price corresponding to such TACO transaction shall be the next following regularly scheduled SOQ of the applicable cash Index adjusted by the Basis established in such TACO transaction.
   For any TACO-eligible futures contract, the magnitude of the Basis in a TACO block trade must be fair and reasonable in light of factors including, but not limited to, financing rates, expected dividend income, and time remaining until the underlying futures contract expiration. A TACO futures transaction may result in an assigned futures price outside of applicable daily price limits.

4. In the event of a disruption in the primary listing exchange for a given cash Index (or a disruption in the applicable national bourse or market in the case of a given non-US cash Index) such that the administrator of such cash Index is unable to produce a regularly scheduled SOQ, all pending and executed TACO transactions in the corresponding futures contract shall be canceled by the Exchange. Such disruption shall be declared by the Exchange in its sole discretion.
5. Additional product-specific TACO requirements are set forth in the applicable product chapter in the Rulebook.

524.D. Trade Marker at Close ("TMAC") Transactions

The following shall govern TMAC transactions:

1. A TMAC order may be entered on Globex at any time the applicable contract is available for TMAC trading on Globex and during such TMAC-eligible contract's prescribed pre-open time period. The initiation of any TMAC order on Globex outside these time periods is prohibited.
2. Unless otherwise specified in the Table, a TMAC-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526 or as an Exchange of Futures for Physical ("EFP") or Exchange of Futures for Risk ("EFR") transaction pursuant to the requirements of Rule 538.
3. Unless otherwise specified by the Exchange, a TMAC transaction may be executed at the current day's applicable marker price or at any valid price increment four ticks higher or lower than the applicable marker price.

NYMEX/COMEX

524. TRADING AT SETTLEMENT ("TAS") AND TRADING AT MARKER ("TAM") TRANSACTIONS

The Exchange shall determine the products, contract months and time periods during which TAS and TAM transactions shall be permitted. Specific products, contract months and spreads eligible for pricing as TAS or TAM transactions are set forth in the TAS Table ("Table") at the end of Chapter 5.

524.A. Trading at Settlement ("TAS") Transactions

The following shall govern TAS transactions:

1. A TAS order may be entered on Globex at any time the applicable contract is available for TAS trading on Globex and during such TAS-eligible contract's prescribed pre-open time period. The initiation of any TAS order on Globex outside these time periods is prohibited.

2. Unless otherwise specified in the Table, a TAS-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526 or as an Exchange of Futures for Physical ("EFP") or Exchange of Futures for Risk ("EFR") transaction pursuant to the requirements of Rule 538.

3. Unless otherwise specified by the Exchange, a TAS transaction may be executed at the current day's settlement price or at any valid price increment ten ticks higher or lower than the settlement price.

524.B. Trading at Marker ("TAM") Transactions

The following shall govern TAM transactions:

1. A TAM order may be entered on Globex at any time the applicable contract is available for TAM trading on Globex and during such TAM-eligible contract's prescribed pre-open time period. The initiation of any TAM order on Globex outside these time periods is prohibited.
2. Unless otherwise specified in the Table, a TAM-eligible product and contract month may be executed as a block trade pursuant to the requirements of Rule 526 or as an EFP or EFR transaction pursuant to the requirements of Rule 538.
3. Unless otherwise specified by the Exchange, a TAM transaction may be executed at the current day's applicable marker price or at any valid price increment ten ticks higher or lower than the applicable marker price.

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Jennifer Dendrinos, Senior Director, Investigations, 312.341.7812

Urmi Graft, Director, Investigations, 312.341.7639

Myles Peralta, Investigations Specialist, 312.454.5310

Penelope Beckhardt, Investigations Specialist, 312.435.3664

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Block Trades**
Rule References	**Rule 526**
Advisory Date	**July 11, 2025**
Advisory Number	**CME Group RA2501-5**
Effective Date	**July 25, 2025**

Effective on trade date Friday, July 25, 2025, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2402-5 from June 17, 2024. It is being issued to provide additional regulatory guidance applicable to block trade strategies involving a CME Group Exchange product and the product of any non-CME Group exchange. Specifically, this updated Advisory Notice addresses the time of execution and pricing requirements for such strategies by amending Section 5, Section 7, Q&A 3, and Q&A 6.

This Advisory Notice contains the following Sections:

1. Definition
2. Participation
3. Different Accounts with Common Beneficial Ownership
4. Eligible Products
5. Time and Prices
6. Minimum Quantities
7. Block Trade Submission
8. Recordkeeping
9. Error Remediation
10. Dissemination of Block Trade Information
11. Use of Nonpublic Information
12. TAS, TAM and TMAC Block Trades
13. Basis Trade at Index Close ("BTIC") and Basis Trade at Cash Open ("TACO") Block Trades
14. Derived Block Trades
15. Text of Rule 526
16. Contact Information
17. Frequently Asked Questions

All block trades are subject to the conditions set forth in Rule 526 and in this Advisory Notice. Violations of the Rule or any of the requirements and prohibitions set forth in this Advisory Notice may result in disciplinary action.

1. Definition of Block Trades

Block trades are privately and bilaterally negotiated futures, options or combination transactions that meet certain quantity thresholds which are permitted to be executed apart from the public auction market.
It is not permissible to facilitate the execution of block trades in Exchange-traded products on a system or facility accessible to multiple parties that allows for the electronic matching of or the electronic acceptance of bids and offers. Parties may use communication technologies to bilaterally request block quotes from one or more participants and to conduct privately negotiated block trades. Parties may also utilize technologies supported by third parties which allow for the electronic posting of indicative block markets displayed to multiple market participants. However, block trades executed between parties based on such

electronically displayed indicative markets may be transacted only through direct bilateral communications involving the broker, where applicable, and the parties to the trade.

Market participants may utilize Directed Request for Quote ("DRFQ") functionality within CME Direct to privately negotiate and execute block trades. Additional information concerning DRFQ functionality, including a description of the workflow and requirements concerning user entitlements, is available at www.cmegroup.com/drfq. Additionally, a short video describing the DRFQ process is available here. To learn more about DRFQ, please contact PlatformSolutions@cmegroup.com.

2. Participation in Block Trades

Each party to a block trade must be an Eligible Contract Participant as that term is defined in Section 1a(18) of the Commodity Exchange Act. Eligible Contract Participants generally include exchange members and member firms, broker/dealers, government entities, pension funds, commodity pools, corporations, investment companies, insurance companies, depository institutions and high net-worth individuals. Commodity trading advisors and investment advisors who are registered or exempt from registration, and foreign persons performing a similar role and subject as such to foreign regulation, may participate in block transactions provided they have total assets under management exceeding $25 million and the block trade is suitable for their customers.

A customer order may be executed by means of a block trade only if the customer has specified that the order be executed as a block trade.

3. Block Trades between Different Accounts with Common Beneficial Ownership

Block trades between different accounts with common beneficial ownership are prohibited unless 1) each party's decision to enter into the block trade is made by an independent decision-maker; 2) each party has a legal and independent bona fide business purpose for engaging in the block trade; and 3) the block trade is executed at a fair and reasonable price. In the absence of satisfying all the aforementioned requirements, the transaction may constitute an illegal wash trade prohibited by Rule 534 ("Wash Trades Prohibited"). Common beneficial ownership is defined as not only accounts with the same beneficial ownership, but also accounts with common beneficial ownership that is less than 100%.

4. Block Eligible Products

A complete list of block eligible products may be found here:

CME, CBOT, NYMEX & COMEX Block Trade-Eligible Products and Minimum Quantity Thresholds

The marketplace is notified of block trade minimum quantity thresholds and any changes thereto via a Special Executive Report issued by Research & Product Development.

Interested market participants may receive these reports via email by visiting the CME Group Subscription Center located at:

http://www.cmegroup.com/tools-information/subscriptions/advisory-subscribe.html

5. Time and Prices of Block Trades

Block trades may be executed at any time, including times during which the public auction market is closed. Block trades may not be executed after the expiration of the underlying futures or options on futures contract month.

Block trades must be transacted at prices that are **"fair and reasonable"** in light of (i) the size of the transaction, (ii) the prices and sizes of other transactions in the same contract at the relevant time, (iii) the prices and sizes of transactions in other relevant markets, including, without limitation, the underlying

cash market or related futures markets, at the relevant time, and (iv) the circumstances of the markets or the parties to the block trade.

The trade price must be consistent with the minimum price increment for the market in question. Additionally, each outright transaction, and each leg of any block eligible spread or combination trade subject to Rule 542 ("Simultaneous Spread and Combination Transactions"), must be executed at a single price.

Block trade strategies involving a CME Group Exchange product and the product of any non-CME Group exchange are considered an outright transaction at the relevant CME Group Exchange, and, as such, will be reviewed for "fair and reasonable" pricing, including appropriate price increments, solely as an outright transaction of the CME Group Exchange product.

Block trade prices do not elect conditional orders (e.g. stop orders) or otherwise affect orders in the regular market.

6. Block Trade Minimum Quantities for Outrights, Spreads and Combinations

The block trade minimum quantity requirements for outright futures and outright options may be found using the link below.

CME, CBOT, NYMEX & COMEX Block Trade-Eligible Products and Minimum Quantity Thresholds

The bunching of block trade orders is not permitted except in the case of eligible CTAs or foreign Persons performing a similar role.

The Chief Regulatory Officer ("CRO") or their designee may exercise reasonable discretion and permit an exception to the block trade minimum threshold where, in the opinion of the CRO or their designee, the situation so requires and such exception is in the best interests of the Exchange, which may include, but is not limited to, instances involving the liquidation of a portfolio of positions where one or more of the legs of the aggregate transaction do not meet the block trade minimum threshold for the respective instrument(s).

Information with respect to minimum quantity thresholds for spreads and combinations executed as block trades may also be found here.

7. Block Trade Submission

Block trades in CME, CBOT, NYMEX and COMEX products must be submitted via CME Direct or CME ClearPort.

a) Submission Time Requirements

After a block trade is consummated it must be submitted to the Exchange via CME Direct or CME ClearPort within 5 or 15 minutes, depending on the product. Submission via CME Direct or CME ClearPort will result in a price report to the marketplace and submission to CME Clearing provided both sides of the trade pass the required credit check and the relevant terms of the respective sides of the trade match.

The execution time of a block trade is the time that the trade is consummated, which is the time that the parties agree to the trade in principle. In that regard, spread block trades, and block trades that are part of a strategy involving a CME Group Exchange product and the product of any non-CME Group exchange, are deemed consummated at the time the parties agree to the differential or combination price, not the time the leg prices are determined. Market participants must accurately report the execution time of the block trade. The reporting of inaccurate execution times may result in disciplinary action.

Where a transaction necessitates the parties to agree to individual leg prices on spread and combination trades, in addition to strategies involving a CME Group Exchange product and the product of any non-CME Group exchange, in order to submit the trade, parties must do so as expeditiously as possible after agreeing to engage in the block trade.

Block trade prices are reported independently of transaction prices in the regular market and are not included as part of the daily trading range.

CME, CBOT, NYMEX & COMEX Block Trade-Eligible Products and Reporting Requirements

b) Additional Submission Requirements and Obligations

Since July 17, 2017, all block trades have been required to be submitted directly to CME Clearing via CME Direct, the CME ClearPort User Interface (UI), or the CME ClearPort API through proprietary or 3rd party software. CME Direct connects to the CME ClearPort API.

For the block trade to be price reported to the marketplace and submitted to CME Clearing, both sides of the trade must pass the required credit check and the relevant terms of the respective sides of the trade must match. If either side does not pass the required credit check or the terms do not match, the block trade price will not be reported to the marketplace and the block trade will remain uncleared.

Entry into CME Direct or CME ClearPort may be done by each of the counterparties to the trade (single-sided entry) or via a broker or other authorized representative (dual-sided entry).

For single-sided entry, the buyer and seller of a block trade may agree to separately enter their side of the block trade into CME Direct or CME ClearPort, indicating each other as the opposite party. In this circumstance, **both** the buyer and seller must enter their respective side of the transaction within the required time period.

For single-sided entry, one side of a trade (either the buyer or seller) may agree to enter their respective side of the trade and allege that trade against the other party. In this circumstance, the other party must ensure the alleged trade is accepted (complete with the correct account information for their side) within the required time period. Consequently, the first party entering their side of the trade should ensure the information being entered is correct and must leave enough time for the second party to accept the trade within the requisite time period.

For dual-sided entry where a broker or other representative is entering the buy and sell side of the block trade on behalf of the counterparties, the broker or other representative is responsible for the entry of the block trade within the requisite time period.

Block Trades in CME and CBOT Products

Block trades may be entered in CME Direct or CME ClearPort from 5:00 p.m. CT Sunday through 5:45 p.m. CT Friday. CME Direct and CME ClearPort do not permit the entry of CME and CBOT block trades during the maintenance window, from 5:45 p.m. CT to 6:00 p.m. CT Monday through Thursday. CME and CBOT block trades negotiated immediately prior to and during the maintenance window must be entered by 6:05 p.m. CT for products subject to a 5-minute reporting requirement or by 6:15 p.m. CT for products subject to a 15-minute reporting requirement.

Block Trades in NYMEX and COMEX Products

Block trades may be entered in CME Direct or CME ClearPort from 5:00 p.m. CT/6:00 p.m. Eastern Time (“ET”) through 4:00 p.m. CT/5:00 p.m. ET each business day. CME Direct and CME ClearPort do not permit the entry of NYMEX and COMEX block trades between 4:00 p.m.

CT/5:00 p.m. ET and 5:00 p.m. CT/6:00 p.m. ET each business day or at any time on weekends. NYMEX and COMEX block trades negotiated immediately prior to and during the time that block trade entry is not permitted must be entered by 5:05 p.m. CT/6:05 p.m. ET for products subject to a 5-minute reporting requirement or by 5:15 p.m. CT/6:15 p.m. ET for products subject to a 15-minute reporting requirement.

Block trades negotiated at any other time during which CME Direct or CME ClearPort are closed must be submitted no later than 5 or 15 minutes after the time CME Direct or CME ClearPort reopens, depending on the reporting requirement for the specific product.

Block trades may also be reported to the CME ClearPort Facilitation Desk/Global Command Center via email at FacDesk@cmegroup.com. **Please note that for the Facilitation Desk to submit the trade, the counterparty accounts must be registered with credit limits and product permissions set up in CME Account Manager.**

The Facilitation Desk is closed from 4:30 p.m. CT/5:30 p.m. ET Friday through 5:00 p.m. CT/6:00 p.m. ET Sunday.

c) Information Required for Reporting Block Trades

When reporting a block trade, the following information is required:

- Contract, contract month and contract year for futures, and, additionally for options, strike price and put or call designation for standard options, as well as the expiration date and exercise style for flex options;
- Quantity of the trade or, for spreads and combinations, the quantity of each leg of the trade;
- Price of the trade or, for certain spreads and combinations, the price of each leg of the trade;
- Account numbers for each side of the trade;
- Buyer's clearing firm and seller's clearing firm;
- For block trades reported via email, name and phone number of the party reporting the trade and counterparty name and contact information for verification purposes; and
- Execution time (to the nearest minute in Central/Eastern Time) of the trade. The execution time is the time at which the trade was consummated as described at the end of this section.

A block trade in a block eligible option may be executed up to and including the day on which an option contract expires for purposes of offsetting an open option position, provided the offsetting block trade is submitted via CME Direct or CME ClearPort no later than the beginning of the CME ClearPort maintenance window.

The failure to submit timely, accurate and complete block trade reports may subject the party responsible for the reporting obligation to disciplinary action. Parties shall not be sanctioned for block reporting infractions deemed to arise from factors beyond the reporting party's control (e.g. the block trade fails the CME ClearPort automated credit check). To self-report an explanation of delays or changes, parties may use the Privately Negotiated Transaction (Blocks/EFRPs) Changes or Delays Portal in the Firm Regulatory Portal.

8. Block Trade Recordkeeping

Complete order records for block trades must be created and maintained pursuant to Rule 536 and CFTC Regulations. Additionally, the time of execution of the block trade must also be recorded for all block trades.

9. Error Remediation

Dual-Sided Entry

For dual-sided entry where a broker or other representative has entered the buy and sell side of the block trade on behalf of the counterparties and the trade has cleared, but for which the broker or other representative has made an error in the terms of the trade, the error may be corrected as follows:
If the error is discovered on the same CME Direct or CME ClearPort trade date on which submission occurred, the broker or other representative may void the erroneous submission and resubmit the block trade with the correct information.

If the error is discovered after the CME Direct or CME ClearPort trade date on which submission occurred, the broker or other representative may request the Exchange to correct the error within three business days.

Single-Sided Entry

For single-sided entry where the trade has cleared, but where an error has been made in the terms of the trade, either party may request the Exchange to correct the error within three business days.

All correction requests made to the Exchange must include evidence that the counterparties to the block trade agree to the correction request. All correction requests are subject to review and approval by the Exchange.

To request a correction please contact the CME ClearPort Facilitation Desk/Global Command Center at +1 800 438 8616 in the U.S., +44 20 7623 4747 in Europe, +65 6532 5010 in Asia, or via email at FacDesk@cmegroup.com.

Error correction requests received after the three-business-day window may not take place without the express approval of CME Clearing. Market participants should contact CME Clearing Services at +1 312 207 2525.

10. Dissemination of Block Trade Information

The date, execution time, contract month, price and quantity of block trades are automatically reported once they are cleared. Block trade information is reported on the MerQuote system and may be accessed by entering the code “BLK”. Block trade information is also displayed on the CME Group website at the following link: http://www.cmegroup.com/tools-information/blocktrades.html. Block trade information is also displayed on the trading floor.

Block trade prices are published separately from transactions in the regular market.

Block trade volume is also identified in the daily volume reports published by the Exchange.

11. Use of Nonpublic Information Regarding Block Trades

a) General

Parties involved in the solicitation or negotiation of a block trade may not disclose the details of those communications to any other party for any purpose other than to facilitate the execution of the block trade. Parties privy to nonpublic information regarding a consummated block trade may not disclose such information to any other party prior to the public report of the block trade by the Exchange. Notwithstanding the preceding sentence, the disclosure of a customer’s identity by a broker is governed solely by the terms of Section b) below. Parties solicited to provide a two-sided block market are not deemed to be in possession of nonpublic information provided side of market interest is not disclosed in the context of the solicitation.

b) Broker Disclosure of Customer Identity

A broker negotiating a block trade on behalf of a customer may disclose the identity of the customer to potential counterparties, including the counterparty with which the block trade is consummated, only with the express permission of the customer. Express consent must be obtained in writing (letter, email, instant message, etc.) or on a recorded phone line, and evidence of such consent must be provided to Market Regulation upon request. Such express consent is not required on a trade-by-trade basis. Express consent is also not required within a firm where such disclosure is necessary to avoid a rule violation.

Except in circumstances where brokers obtain express consent on a trade-by-trade basis, brokers must reconfirm such consent on no less than an annual basis. For the reconfirmation, negative consent is permissible. Brokers should retain documentation evidencing the annual reconfirmation and must provide it to Market Regulation upon request.

With a customer's consent, the broker may disclose the customer's identity solely to parties involved in the block trade negotiation, including the party with whom the block trade is consummated. Disclosure to anyone else is strictly prohibited.

c) Pre-Hedging/Anticipatory Hedging

Parties to a potential block trade may engage in pre-hedging or anticipatory hedging of the position that they believe in good faith will result from the consummation of the block trade, except for an intermediary that takes the opposite side of its own customer order. In such instances, prior to the consummation of the block trade, the intermediary is prohibited from offsetting the position they anticipate to be established by the block trade in any account which is owned or controlled, or in which an ownership interest is held, or for the proprietary account of the employer of such intermediary. The intermediary may enter into transactions to offset the position only after the block trade has been consummated.

Market Regulation will consider the entirety of the communications pertaining to the negotiation and execution of a block trade, including pre-existing disclosures, in assessing whether a pre-hedging party is acting in a principal capacity. A party acting principally in a block trade negotiation that plans on engaging in pre-hedging activity must ensure it is clear to its counterparty that the party is trading principally, and, as such, owes no agency duties to the counterparty. Disclosures in the header/footer of a party's instant message communications advising that the party is acting principally and owes no agency duties to the counterparty would suffice. Alternatively, such disclosures could be made in other recorded communications contemporaneously with the block trade negotiation and prior to the principal engaging in pre-hedging. Disclosures in account opening agreements or other similar non-contemporaneous communications may be deemed insufficient if the block trade negotiation itself indicates, implies, or infers that agency duties may be owed to the counterparty. Conflicting inferences will be viewed by Market Regulation in a light most favorable to the counterparty.

While pre-hedging may be permissible, it is a violation of exchange Rule 532 for a person to engage in front-running conduct, including directly or indirectly trading on the basis of material nonpublic information when they know or reasonably should have known the information was obtained or disclosed through fraud, deception, or in violation of a pre-existing duty.

The Exchange may proceed with an enforcement action when the facts and circumstances of pre-hedging suggest deceptive or manipulative conduct by any of the involved parties, including when an intermediary handling a customer order violates duties owed to the customer.

This guidance applies only in the context of pre-hedging of block trades. This guidance does not affect any requirement under the CEA or CFTC Regulations.

12. TAS,TAM, and TMAC Block Trades

Certain block eligible futures contract months may be executed as block trades and assigned the current day's settlement price or any valid price increment ten ticks higher or lower than the settlement price ("TAS block trades"). Certain block eligible futures contract months may also be executed as block trades and assigned the current day's marker price or any valid price increment ten ticks higher or lower than the marker price ("TAM block trades"). Certain block eligible futures contract months may also be executed as block trades and assigned the current day's marker price or any valid price increment four ticks higher or lower than the marker price ("TMAC block trades").

Additionally, intra-commodity calendar spreads may be executed as TAS or TAM block trades provided the underlying spread is eligible for TAS or TAM trading. Please refer to the most recent Advisory Notice on TAS and TAM transactions for the list of products, contract months and spreads for which TAS or TAM pricing is permitted.

TAS block trades, including eligible TAS calendar spread block trades, may not be executed on the last day of trading in an expiring contract.

The products and contract months in which TAS.TAM and TMAC block trades are permitted are set forth in the list of block trade eligible products which is available on the CME Group website via the following link:

Block Trade-Eligible Products and Minimum Quantity Thresholds

13. Basis Trade at Index Close ("BTIC") and Basis Trade at Cash Open ("TACO") Block Trades

A BTIC transaction is an Exchange futures transaction that is priced with reference to the applicable cash Index closing level. For a BTIC block trade executed on a given Trading Day on or before the scheduled close of the underlying primary securities market, the corresponding futures price shall be made by reference to the Index closing value for the current Trading Day. BTIC block trades are not permitted on the last day of trading in an expiring contract month.

A TACO transaction is an Exchange futures transaction that is priced with reference to the next following regularly scheduled special opening quotation ("SOQ") of such futures contract's underlying cash Index.

A list of BTIC block eligible products and block minimum thresholds is available on the CME Group website via the following link:

BTIC Block Trades Table

The futures price assigned to a BTIC block trade will be the current day's applicable cash Index closing level adjusted by any valid price increment (the "Basis") higher or lower than the current day's cash Index closing level.

The futures price assigned to a TACO block trade will be the next following regularly scheduled special opening quotation ("SOQ") of the applicable cash Index adjusted by any valid Basis higher or lower than the SOQ.

The Basis in BTIC and TACO transactions must be stated in full tick increments as set forth in the applicable product chapter and must be fair and reasonable taking into account financing rates, expected dividend income and the time remaining until the applicable futures contract expires.

The futures price of a BTIC block trade will be determined by the Exchange at 3:45 p.m. Central Time and the Exchange-determined price will be final at that time. In the event of an early scheduled close of the primary securities market, the futures price of a BTIC block trade will be determined by the Exchange 45 minutes after the early scheduled close time for the primary securities market, and the Exchange-determined price will be final at that time. In the event of an equity market disruption in the primary securities market, all BTIC block trades will be cancelled for that trade date.

The futures price of a TACO block trade will be determined by the Exchange shortly after the SOQ is disseminated by Standard & Poor's. In the event of a disruption in the primary listing exchange for a given cash Index such that the administrator of such cash Index is unable to produce a regularly scheduled SOQ, all TACO block trades which rely on that SOQ will be cancelled.

Except as identified in the list of block eligible products, BTIC and TACO block trades **may not** be executed as a spread transaction. Parties wishing to effectuate a block spread transaction will be required to negotiate the transaction as separate outright BTIC or TACO block trades, with each leg meeting the applicable block trade minimum threshold.

14. Derived Block Trades

A derived block trade is a transaction in an eligible contract in which a dealer consummates a block trade with a client but where the price and quantity of the block trade depends on one or more hedging transactions by the dealer that take place after the block trade has been consummated, but prior to the block trade being submitted to the Exchange. Derived block trades are available solely in contracts identified here, at the existing block trade minimum threshold applicable to those products.

Derived block trades are not permitted in any other products.

The counterparties to a derived block trade must comply with the following requirements and procedures:

General Requirements

- The counterparties must agree that the execution will be done as a derived block trade
- A written or electronic record of the terms of the transaction must be created and maintained pursuant to the requirements of Rule 536.E.
- Prior to the execution of any hedging transactions, the dealer and client must consummate the block trade and determine and agree upon the following:
  - The quantity of futures or the notional value of the block trade, which must meet or exceed the applicable block trade minimum quantity threshold;
  - The execution methodology for the dealer's hedging transaction(s);
  - The markets in which the dealer's hedging transactions will take place; and
  - The pre-determined basis to be used by the dealer in determining the price of the block trade after the hedging transactions have been concluded.
- The hedging transactions and the consummated block trade must occur and be submitted to the Exchange on the same Exchange business day by 5:45 p.m. CT,
- No spread trades are permitted for derived block trades

Permissible hedging vehicles include stock baskets, other cash market instruments such as Exchange Traded Funds (ETFs), Exchange Traded Notes (ETNs), and/or equity index futures or options on futures contracts. At a minimum, the hedging vehicles must evidence a reasonable degree of price correlation to the equity index futures product underlying the derived block trade.

Permissible execution methodologies governing the execution of the hedges may include volume weighted average price ("VWAP"), time weighted average price ("TWAP"), percentage of volume ("POV"), limit price, or other agreed upon hedge types as determined by the dealer and the client at the time the block trade is consummated, and must be identified when submitting the block trade via CME Direct.

If the dealer is unable to execute the full quantity of hedges necessary to support the originally agreed upon quantity of the block trade consummated with the client, the dealer must, at a minimum, submit the block trade at a quantity that corresponds to the quantity of hedges the dealer executed. Alternatively, with the client's consent, the dealer may submit the block trade up to the full quantity originally agreed upon.

In the event the quantity of hedges does not meet the block trade minimum threshold, the dealer may, with the client's consent, submit the block trade at any quantity at or in excess of the block trade minimum threshold. Alternatively, the dealer may notify the client that no block trade was able to be submitted due to the lack of sufficient hedges to meet the block trade minimum quantity threshold. If no block trade is submitted, the dealer must keep a record noting that the block trade could not be submitted and produce the record to Market Regulation upon request.

Submission Requirements

- Derived block trades must be submitted via CME Direct by the dealer facilitating the trade (dual-sided entry) no later than 5:45 p.m. CT on the day the trade occurs;
- The block trade must be accurately identified within CME Direct by checking the derived block checkbox;
- The dealer must provide the following additional information concerning the hedging activity when submitting the derived block trade via the CME Direct block entry ticket:
    - The hedge type (VWAP, TWAP, POV, Limit, or Other);
    - The hedge description;
    - The product(s) in which the hedge(s) took place (free form text box);
    - The basis used for determining the block trade price (expressed in Index points); and
- The time of execution submitted into CME Direct must accurately identify the time that the dealer and the client consummated the block trade in principle, which must have been prior to the commencement of any hedging activity; and

Derived block trades will be uniquely identifiable when the price is reported on the CME Group website and distributed via market data.

15. Text of Rule 526

Rule 526 BLOCK TRADES

The Exchange shall designate the products in which block trades shall be permitted and determine the minimum quantity thresholds for such transactions. Additionally, with respect to block trades in swaps, the minimum size for such transactions shall be established at levels at or in excess of those set forth in Appendix F to Part 43 of CFTC Regulations *[this sentence appears solely in CBOT's rule]*. The following shall govern block trades:

A. A block trade must be for a quantity that is at or in excess of the applicable minimum threshold. Orders may not be aggregated in order to achieve the minimum transaction size, except by those entities described in Sections I. and J.

B. Each party to a block trade must be an Eligible Contract Participant as that term is defined in Section 1a(18) of the Commodity Exchange Act.

C. A member shall not execute any order by means of a block trade for a customer unless such customer has specified that the order be executed as a block trade.

D. The price at which a block trade is executed must be fair and reasonable in light of (i) the size of the block trade, (ii) the prices and sizes of other transactions in the same contract at the relevant time, (iii) the prices and sizes of transactions in other relevant markets, including without limitation the underlying cash market or related futures markets, at the relevant time, and (iv) the circumstances of the markets or the parties to the block trade.

E. Block trades shall not set off conditional orders (e.g., Stop Orders and MIT Orders) or otherwise affect orders in the regular market.

F. Unless otherwise agreed to by the principal counterparties to the block trade, the seller, or, in the case of a brokered transaction, the broker handling the block trade, must ensure that each block trade is reported to the Exchange within the time period and in the manner specified by the Exchange. The report must include the contract, contract month, price, quantity of the transaction, the respective clearing members, the time of execution, and, for options, strike price, put or call and expiration month. The Exchange shall promptly publish such information separately from the reports of transactions in the regular market.

G. Block trades must be reported to the Clearing House in accordance with an approved reporting method.

H. Clearing members and members involved in the execution of block trades must maintain a record of the transaction in accordance with Rule 536.

I. A commodity trading advisor ("CTA") registered or exempt from registration under the Act, including, without limitation, any investment advisor registered or exempt from registration under the Investment Advisors Act of 1940, shall be the applicable entity for purposes of Sections A., B., C., and D., provided such advisors have total assets under management exceeding $25 million and the block trade is suitable for the customers of such advisors.

J. A foreign Person performing a similar role or function to a CTA or investment advisor as described in Section I, and subject as such to foreign regulation, shall be the applicable entity for purposes of Sections A., B., C., and D., provided such Persons have total assets under management exceeding $25 million and the block trade is suitable for the customers of such Persons.

16. Contact Information

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Urmi Graft, Director, Investigations, 312.341.7639

Cash Kinghorn, Manager, Investigations, 312.930.1873

Tiffany Riviere, Lead Investigator, 312.930.2316

Penelope Beckhardt, Investigations Specialist, Investigations, 312.435.3664

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Trenton Crawford, Senior Specialist, Rules & Regulatory Outreach, 312.307.9006

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

17. Frequently Asked Questions

Q1: Does a broker or intermediary need to be an ECP to facilitate a block trade between two eligible parties?

A1: Only the buyer and seller of a block trade need to meet the participation requirements as codified in Rule 526.B. and the associated guidance in Section 2 of this Advisory Notice. All parties to a block trade must be appropriately registered in the industry for the business they are conducting and have their accounts and access properly permissioned in CME Direct and/or ClearPort prior to agreeing to or executing a block transaction. Please note that a broker registered in ClearPort is not necessarily the same as a “Broker” registered in the industry. See definitions in ClearPort User Guide.

Q2: Can positions be transferred via block trades?

A2: Transfers should be executed pursuant to Rule 853. Parties effectuating a transfer via the execution of a block trade must ensure the execution meets the requirements of Rule 526 and this Advisory Notice, namely Section 3, which requires independent decision-makers on both sides of the transaction, independent and bona fide business purposes, and a fair and reasonable price. Executing a block trade, or multiple block trades, for accounts with common beneficial ownership in a manner that negates or strictly limits market risk may be deemed a direct or indirect wash trade.

Q3: May a block trade be executed at a price below the minimum price increment?

A3: No. Each block trade must be negotiated and executed at the minimum price increment. A broker may not accept an order for a price below the minimum price increment. It is not, however, a violation if two or more block trades that are each independently negotiated and executed at the minimum price increment achieve an average price that is below the minimum price increment.

Block trade strategies that include a non-CME Group product traded at a differential, where the differential would imply a block trade price below the minimum price increment for the CME Group leg, may be reported as two block trades at eligible price increments. In such instances, each CME Group component must meet the minimum quantity threshold for the outright product and the average price shall only be derived from two price levels that are one price level apart. The time of execution is the time that the differential is agreed upon. The parties are expected to price the components as expeditiously as possible and identify the trades using the Cross-Exchange Spread Indicator as described in Q&A 14 of this Advisory Notice.

Q4: If a party charges a fee or commission in connection with a block trade, would that party be prohibited from pre-hedging?

A4: If a party or party's employing firm charges their block counterparty a brokerage or commission fee, Market Regulation will infer that agency duties were owed to the counterparty. The party charging the brokerage or commission would therefore be prohibited from pre-hedging the block trade. This prohibition does not apply to scenarios where the pre-hedging party's employing firm charges fees to the counterparty that are typically part of servicing of the counterparty's account, such as give-up or clearing fees, regulatory fees, block reporting fees, etc., so long as the fees do not represent a commission or charge that indicates or implies that the block was intermediated, or broker assisted. Market Regulation may evaluate if the negotiated price of the block trade includes an add-on commission from which agency duties could be inferred, including for example if a pre-hedging party shares profits with the party's agency desk for a specific block trade.

Q5: What factors will Market Regulation consider in assessing whether communications during a block negotiation indicate, imply or infer that agency duties may be owed to the counterparty?

A5: Market Regulation will consider the entirety of the communications pertaining to the block trade, including prior disclosures. Representations by a party that they will "work an order" *on behalf of* a counterparty implies that they are engaging in activity on behalf of and in the best interest of the counterparty. Agency duties may be inferred from that communication and pre-hedging would be prohibited. To avoid conflicting inferences from common trade parlance, such as "working an order," parties intending on pre-hedging should ensure through recorded communications that the counterparty is aware that the party is acting in a principal capacity and owes no duties to the counterparty.

Q6: What is the time of execution of the block trade?

A6: Block trades are executed at the time the parties agree to the trade in principle and all material terms are known or reasonably determinable. For outright transactions, this means when the parties agree to the terms deemed material to the agreement, including, but not limited to: a specific or reasonably determinable and reportable price (e.g. the daily settlement price) and the quantity of the transaction. For spreads, and block trades that are part of a strategy involving a CME Group Exchange product and the product of any non-CME Group exchange, the time of execution is the time that the parties agree to the price differential.

Example 1: At 1:00pm CT, a customer placed an order with an intermediary to purchase 50 contracts in a futures contract at a differential (+0.50) to the underlying index, which is to be published at 9:00pm CT. At 2:00pm, the intermediary found a seller and both parties indicated interest in consummating a transaction once the underlying index price is published at 9:00pm CT. At 9:00pm CT, the relevant index was circulated, which provided for an index price of 600.00. At such point, in order to consummate the transaction and meet the Exchange's private negotiation standard, the intermediary must receive from each of the counterparties to the transaction confirmation of the final price of the transaction (600.50). At 9:10pm CT, both parties

agreed to the price, quantity, market, and all other material terms of the transaction. The details of the block trade must then be submitted to the Exchange within 5 or 15 minutes depending on the product, noting the execution time of the transaction as the time the counterparties agreed to the final price of the transaction (9:10pm CT).

Example 2: At 1:00pm CT, a customer placed an order with an intermediary to purchase 50 contracts of a CME Group futures contract and 50 contracts of a non-CME Group futures contract at a differential (22.5) between the two products. Placing the order in this manner gives the intermediary price discretion to fill the CME Group futures contract at a price that achieves such a differential. At 1:05pm CT, the intermediary and a counterparty agree to the 22.5 differential price. The time of execution is 1:05pm CT and, because this trade incorporates a non-CME Group product, the CME Group block trade must be reported within 15 minutes as described in Q&A 14 of this Advisory Notice.

Q7: What does it mean for a trade to have independent decision-makers?

A7: In the context of block trades between accounts with common beneficial ownership, independent decision-makers are parties who each manage separate accounts with separate business purposes and reporting structures. Where parties cannot demonstrate independence in decision making, the transaction may constitute an illegal wash trade prohibited by Rule 534 (“Wash Trades Prohibited”). Common beneficial ownership is defined as not only accounts with the same beneficial ownership, but also accounts with common beneficial ownership that is less than 100%.

Q8: How should a market participant handle simultaneously received buy and sell block orders?

A8: Market participants, including account executives, brokers, or other intermediaries, who accept simultaneous buy and sell orders for execution have an independent “duty to inquire” about the propriety of such orders. In the absence of such inquiry, the market participant accepting the orders may be found to have aided and abetted wash trades if the execution of the orders produces a wash result. Market participants receiving simultaneous buy and sell orders for block execution must inquire to ascertain whether the orders are for accounts with common beneficial ownership.

If the buy and sell orders are for accounts with common beneficial owners, the broker must ensure the block transaction satisfies this Advisory Notice and Rule 526, including that the opposing orders were placed by independent decision-makers, each having bona fide business purposes for the transaction. Further, block trades require private and bilateral negotiation. The market participant receiving the simultaneous buy and sell orders for common beneficial owners may not simply match the orders opposite one another and submit the transaction to the Exchange as a block trade. There must be a private negotiation between the buyer and seller, even if it is through an intermediary.

To the extent the market participant solicits another to act as the counterparty to both the buy and sell block orders, each buy and sell must be separately negotiated and not made contingent on the other.

Executing both buy and sell orders opposite a single counterparty in a manner that negates or strictly limits market risk may produce a wash result for the buyer, seller, and counterparty who bought and sold. In the event a wash result occurs, the facilitating market participant may be liable as an aider and abettor pursuant to Rule.432.X.

Q9: When is information about a block trade considered public?

A9: Information about a block trade is considered public when the Exchange disseminates to the marketplace details concerning the block trade. Parties may rely on a complete, accurate and confirmed report of the block trade to the Exchange as immediately disseminated and therefore public.

Q10: When is a market participant considered in possession of nonpublic information and therefore prohibited from sharing, or trading based on, that information?

A10: Parties who have been solicited to engage in a block trade where the price or side of market of a block order or potentially forthcoming block order has been disclosed are considered in possession of nonpublic information and may not use or disclose such information pursuant to the guidance in this Advisory Notice and Rule 532. Parties who discuss general market color or provide/solicit two-sided markets are not considered in possession of nonpublic information.

Parties to an executed block trade are also in possession of nonpublic information until the public report of the block trade by the Exchange. Such parties are, however, permitted to hedge the risk associated with their block trade after consummation but before the public report of the block trade. Additionally, principals to a block trade as described in Section 11.c. may engage in pre-hedging or anticipatory hedging of the position that they believe in good faith will result from the consummation of the block trade.

Q11: Can the price of a block trade be changed after execution?

A11: The price of the block trade that is submitted to the Exchange must match the price that was agreed to by the parties in the negotiation and reflected in records, communications, or other audit trail. Errors in reporting block trade details to the Exchange may be corrected as outlined in Rule 808.H. or described in the Error Remediation section of this Advisory Notice.

Q12: Is it permissible to execute a block trade at the settlement price in a product that is not TAS eligible?

A12: To the extent a product is not TAS-eligible as a block trade, parties are not permitted to execute a block trade at the settlement price until the settlement price has been published by the Exchange. Parties may have discussions of interest in engaging in a block trade to be priced at the settlement price for a non-TAS-eligible product prior to the settlement price being known. Once the settlement price is known, the parties may agree to such price and execute the block trade.

Q13: A party wishes to trade an option block trade without a delta hedge. How can a liquidity provider pre-hedge the delta risk that they expect to result from the future consummation of the option block trade in compliance with Rule 526 and this Advisory Notice?

A13: In this scenario, the material terms of the option block transaction may not be reasonably determinable or agreed to until the liquidity provider is able to ascertain market pricing based on the liquidity provider's pre-hedging activity. Typically, a party solicits a liquidity provider, who is acting in a principal capacity, for an indication of interest in executing an option block trade where the negotiated price of the block trade is dependent on the hedging that the liquidity provider is able to achieve in the underlying futures product. After receiving the solicitation, the liquidity provider pre-hedges the position that they believe in good faith will result from the future consummation of the option block trade. The liquidity provider subsequently shows a firm price to the counterparty. If the counterparty agrees to the trade, the option block trade is considered executed, and the parties must submit the transaction within the required timeframe for the product. If, however, the counterparty and liquidity provider do not come to an agreement for the option block trade, the pre-hedging will still be deemed to have been done in good faith.

Please note that the price of the option block trade must be fair and reasonable in light of (i) the size of the transaction, (ii) the prices and sizes of other transactions in the same contract at the

relevant time, (iii) the prices and sizes of transactions in other relevant markets, including, without limitation, the underlying cash market or related futures markets, at the relevant time, and (iv) the circumstances of the markets or the parties to the block trade. In ascertaining the reasonableness of the options block trade price, Market Regulation may consider the time required for the liquidity provider to reasonably pre-hedge the position they believed would result from the future consummation of the options block trade.

Q14: What is the reporting time requirement for block strategies involving a CME Group Exchange product and a futures or options on futures product of a non-CME Group exchange?

A14: In assessing the timeliness of a block trade report to the Exchange, Market Regulation will consider whether the block trade was a component of a strategy involving a CME Group Exchange product and a block trade of a product of a non-CME Group exchange. If parties indicate at the time of submission that the CME Group exchange component was part of a strategy involving a non-CME Group exchange, Market Regulation will consider the block trade to have been timely reported if the transaction information was submitted to the Exchange within 15 minutes of execution. Parties can indicate a block trade was a component of a block trade incorporating a non-CME Group product through the self-reporting tool in the Firm Regulatory Portal or by utilizing the Cross Exchange Spread Indicator on CME Direct or ClearPort. In reviewing these transactions, Market Regulation may require parties to provide transaction details concerning the non-CME Group exchange block transaction.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Improper Use or Disclosure of Non-Public Information Prohibited**
Rule References	**Rule 532**
Advisory Date	**September 15, 2023**
Advisory Number	**CME Group RA2305-5**
Effective Date	**September 29, 2023**

Effective on September 29, 2023, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2110-5 from August 30, 2021. It is being issued to reflect amendments to Rule 532 which are intended to align the text of the rule with CFTC final Rule 180.1 and associated guidance regarding material non-public information, and to explicitly protect non-public information beyond non-public order information.

Rule 532 prohibits a person from improperly using, disclosing, or soliciting material non-public information, except in limited circumstances. The prohibition in Rule 532 does not apply to orders executed pursuant to CME, CBOT and NYMEX/COMEX Rules 526 ("Block Trades"), 538 ("Exchange for Related Positions"), and 539 ("Prearranged, Pre-Negotiated and Noncompetitive Trades Prohibited"), provided that such orders are executed pursuant to the specific requirements of those rules. Market participants must ensure that any disclosure of nonpublic order information in connection with executions made as a result of the allowable private negotiation requirements of those rules does not exceed what is allowable under the rules or any regulatory guidance provided in Market Regulation Advisory Notices specific to those rules.

The entry of an order or the execution of a trade, either on the electronic platform or via open outcry, based on the knowledge of an order that has not been bid or offered in the market is a violation of Rule 532.

The text of each Exchange's Rule 532 is set forth below.

532. IMPROPER USE OR DISCLOSURE OF NON-PUBLIC INFORMATION PROHIBITED

Except as permitted by other Exchange rules, including, but not limited to, Rules 526, 538 and 539, no Person shall:

a. Directly or indirectly trade (or enter, cancel, or modify an order) on the basis of material non-public information when they know or reasonably should have known the information was obtained or disclosed through fraud, deception, or in violation of a pre-existing duty (established by law, rule, agreement, understanding, or some other source);

b. Disclose material non-public information when they know or reasonably should have known the disclosure of the information would violate a pre-existing duty (established by law, rule, agreement, understanding, or some other source) owed to another, except when the disclosure is made to an Exchange official, a permitted government official, or is required by law;

c. Solicit or induce another person to disclose material non-public information.

The mere statement of opinions or general market conditions does not constitute a violation of this rule. An order for execution is material and not public information until it has been exposed to the market.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Aaron Smith, Executive Director, Investigations, 312.435.3754

Jennifer Dendrinos, Senior Director, Investigations, 312.341.7812

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Simultaneous Buy and Sell Orders for Different Beneficial Owners; Trading Against Customers' Orders Prohibited**
Rule References	**Rule 533 and Rule 531**
Advisory Date	**August 30, 2021**
Advisory Number	**CME Group RA2113-5**
Effective Date	**October 1, 2021**

Effective on trade date Friday, October 1, 2021, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1617-5 from December 13, 2016. It is being issued to reflect amendments to CME, CBOT, and NYMEX/COMEX Rule 533 ("Simultaneous Buy and Sell Orders for Different Beneficial Owners") and CME and CBOT Rule 531 ("Trading Against Customers' Orders Prohibited") that will become effective on October 1, 2021.

The amendments to CME, CBOT, and NYMEX/COMEX Rule 533 reduce the waiting period between order entries into CME Globex from 15 to 5 seconds for simultaneous buy and sell options orders for different beneficial owners. The other amendments to CME Rule 533 and the amendments to CME and CBOT Rule 531 are in connection with the September 30, 2021, closure of the trading floor for all products other than options on CME Eurodollar futures and options on CME SOFR futures.[1]

Overview

This Advisory Notice clarifies the proper procedures for the handling of simultaneous buy and sell orders for different beneficial owners in open outcry and electronic markets pursuant to Rules 533 and 531. The complete text of these rules begins on page 2 of this Advisory Notice.

Neither this Advisory Notice nor the rules referenced herein pertain to transactions on CME Globex that involve pre-execution communications. Pre-execution communications are addressed in each exchange's Rule 539 ("Prearranged, Pre-Negotiated and Noncompetitive Trades Prohibited") and in the Market Regulation Advisory Notice concerning Rule 539, which can be found on the Rulebook Harmonization page at the following link:

http://www.cmegroup.com/rulebook/rulebook-harmonization.html

CME Open Outcry Markets

CME Rule 533 allows for the direct crossing of buy and sell orders by a floor broker provided that the orders are for the accounts of different beneficial owners and the floor broker executing the orders first openly bids and offers the price and quantity three times in a manner that is transparent to the pit. If neither the bid nor the offer is accepted, then the floor broker may match the orders, or any remaining portion of the orders, in the presence of, and with the approval of, a Floor Operations staff member. A floor broker may not cross an order with a trade for their own account, an account in which they have a direct or indirect financial interest, or an account over which they have discretionary trading authority unless they comply with the requirements set forth in Section B. 5. of Rule 531. ("Trading Against Customers' Orders Prohibited").

[1] Please see Special Executive Report S-8833 from August 27, 2021, for additional information on the rule amendments.

A floor broker who executes a cross trade must ensure that it is reported to Exchange price reporting staff for entry into the Price Reporting System as a cross trade. Failure to identify the transaction to Exchange price reporting staff as a cross trade shall constitute a violation of the rule.

Market participants are reminded that pre-execution communications or any other form of prearrangement are prohibited with respect to all orders entered for execution in the open outcry venue.

CME, CBOT, NYMEX and COMEX Electronic Markets

In electronic markets, opposite orders for different beneficial owners that are simultaneously placed by a party with discretion over both accounts may be entered on the electronic platform provided that one order is exposed for a minimum of 5 seconds. Similarly, an order allowing for price and/or time discretion, if not entered immediately upon receipt, may be knowingly entered opposite another order entered by the same firm only if the other order has been entered immediately upon receipt and has been exposed for a minimum of 5 seconds. Orders involving pre-execution communications are separately governed by each Exchange's Rule 539.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286
Trenton Crawford, Senior Specialist, Rules & Regulatory Outreach, 312.307.9006
Aaron Smith, Executive Director, Investigations, 312.435.3754
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Natasha Selkov, Manager, Investigations, 312.341.7623

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

CME

533. SIMULTANEOUS BUY AND SELL ORDERS FOR DIFFERENT BENEFICIAL OWNERS

A member who is in possession of both buy and sell orders for different beneficial owners for the same product and expiration month, and, for a put or call option, the same strike price, may execute such orders for and directly between such beneficial owners provided that in pit trading, a member executing such orders shall first bid and offer by open outcry three times at the same price, stating the number of contracts, and, thereafter, if neither the bid nor the offer is accepted, the orders may be matched in the presence, and with the approval, of a designated Exchange official.

The member making such transactions shall, by appropriate descriptive words or symbols, clearly identify all such transactions on their trading card or other similar record made at the time of the execution. The member executing such trade must ensure that it is reported to Exchange price reporting staff for entry into the Exchange Price Reporting System. Failure to identify the transaction to Exchange price reporting staff as a cross trade shall constitute a violation of this rule.

On the Globex platform, opposite orders for different beneficial owners that are simultaneously placed by a party with discretion over both accounts may be entered into the Globex platform provided that one order is exposed for a minimum of 5 seconds. An order allowing for price and/or time discretion, if not entered immediately upon receipt, may be knowingly entered opposite another order entered by the same firm only if this other order has been entered immediately upon receipt and has been exposed on the Globex platform for a minimum of 5 seconds.

531. TRADING AGAINST CUSTOMERS' ORDERS PROHIBITED

531.A. General Prohibition

No person in possession of a customer order shall knowingly take, directly or indirectly, the opposite side of

such order for their own account, an account in which they have a direct or indirect financial interest, or an account over which they have discretionary trading authority.

531.B. Exceptions

The foregoing restriction shall not apply to the following:

1. Transactions executed in accordance with Rule 527 to resolve bona fide outtrades or errors;
2. Transactions executed pursuant to Rule 538;
3. Block trades executed pursuant to Rule 526;
4. On the Globex platform, a person may knowingly trade against their customer order for their own account, an account in which they have a direct or indirect financial interest, an account over which they have discretionary trading authority, or a proprietary account of their employer, only if the customer order has been entered immediately upon receipt and has first been exposed on the Globex platform for a minimum of 5 seconds in the case of futures or swaps orders or for a minimum of 15 seconds in the case of options orders; and
5. If the transaction was pit traded, a person may knowingly trade against their customer order for their own account, an account in which they have a direct or indirect financial interest, an account over which they have discretionary trading authority, or a proprietary account of their employer, only if: (i) the customer has consented in writing to waive the application of Rule 531.A no more than 12 months prior to the transaction; (ii) the member complies with the requirements set forth in Rule 533; (iii) the member clearly identifies, by appropriate descriptive words, all such transactions, and (iv) the member ensures that it is reported to Exchange price reporting staff for entry into the Exchange Price Reporting System as a cross trade.

CBOT and NYMEX/COMEX

533. SIMULTANEOUS BUY AND SELL ORDERS FOR DIFFERENT BENEFICIAL OWNERS

On the Globex platform, opposite orders for different beneficial owners that are simultaneously placed by a party with discretion over both accounts may be entered into the Globex platform provided that one order is exposed for a minimum of 5 seconds. An order allowing for price and/or time discretion, if not entered immediately upon receipt, may be knowingly entered opposite another order entered by the same firm only if this other order has been entered immediately upon receipt and has been exposed on the Globex platform for a minimum of 5 seconds.

531. TRADING AGAINST CUSTOMERS' ORDERS PROHIBITED

531.A. General Prohibition

No person in possession of a customer order shall knowingly take, directly or indirectly, the opposite side of such order for their own account, an account in which they have a direct or indirect financial interest, or an account over which they have discretionary trading authority.

531.B. Exceptions

The foregoing restriction shall not apply to the following:

1. Transactions executed in accordance with Rule 527 to resolve bona fide errors;
2. Transactions executed pursuant to Rule 538;
3. Block trades executed pursuant to Rule 526; and
4. On the Globex platform, a person may knowingly trade against their customer order for their own account, an account in which they have a direct or indirect financial interest, an account over which they have discretionary trading authority, or a proprietary account of their employer, only if the customer order has been entered immediately upon receipt and has first been exposed on the Globex platform for a minimum of 5 seconds in the case of futures or swaps *[the reference to swaps appears solely in CBOT Rule 531]* orders or for a minimum of 15 seconds in the case of options orders.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Wash Trades Prohibited**
Rule References	**Rule 534**
Advisory Date	**September 2, 2020**
Advisory Number	**CME Group RA2008-5**
Effective Date	**September 17, 2020**

Effective on trade date September 17, 2020, and pending all relevant CFTC regulatory review periods, this Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1905-5 from April 11, 2019. It is being issued to amend Q&A 12 to eliminate a reference to a legacy front-end audit trail tag and its associated number in connection with the migration from iLink2 to iLink 3, a new order entry protocol for trading futures and options markets on the CME Globex electronic trading platform.

No substantive information in this Advisory Notice has been amended.
Rule 534, set forth below, has not changed, and this Advisory Notice is being issued to provide updated guidance regarding compliance with Rule 534. Member firms are strongly encouraged to ensure that all firm employees and customers are fully informed regarding Rule 534 and the guidance in this Advisory Notice.

Rule 534 ("Wash Trades Prohibited")

No person shall place or accept buy and sell orders in the same product and expiration month, and, for a put or call option, the same strike price, where the person knows or reasonably should know that the purpose of the orders is to avoid taking a bona fide market position exposed to market risk (transactions commonly known or referred to as wash trades or wash sales). Buy and sell orders for different accounts with common beneficial ownership that are entered with the intent to negate market risk or price competition shall also be deemed to violate the prohibition on wash trades. Additionally, no person shall knowingly execute or accommodate the execution of such orders by direct or indirect means.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Jennifer Dendrinos, Senior Director, Investigations, 312.341.7812

Natasha Selkov, Manager, Investigations, 312.341.7623

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

Frequently Asked Questions ("FAQ") Related to Rule 534 ("Wash Trades Prohibited")

Q1: What is the definition of a wash trade?

A1: A wash trade is a form of fictitious trade in which a transaction or a series of transactions give the appearance that bona fide purchases and sales have been made, but where the trades have been entered into without the intent to take a bona fide market position or without the intent to execute bona fide transactions subject to market risk or price competition. Parties who initiate, execute or accommodate transactions which they know, or reasonably should know, will achieve a wash result shall be in violation of Rule 534.

A wash trade requires:

a) that the transaction or series of transactions produces a wash result - meaning the purchase and sale of the same instrument at the same price, or a similar price, for accounts with the same beneficial ownership or for accounts with common beneficial ownership; and

b) that the party(ies) intended to achieve a wash result. Intent may be inferred from evidence of prearrangement or from evidence that the orders or trade(s) were structured, entered or executed in a manner that the party(ies) knew, or reasonably should have known, would produce a wash result.

The prearrangement, execution or structuring of transactions in CME Group markets with the intent of negating market risk, independent of whether such transactions are entered and/or executed in compliance with other rules which permit prearrangement such as Rule 539.C. ("Pre-Execution Communications Regarding Globex Trades") may be deemed to violate Rule 534.

Q2: What does it mean to have accounts "with the same beneficial ownership" or "with common beneficial ownership" in the context of Rule 534's prohibition on wash trades?

A2: Accounts with the "same beneficial ownership" include accounts with identical ownership as well as accounts of different entities that are 100% wholly-owned by the same parent.

"Common beneficial ownership" is more inclusive and includes not only accounts with the same beneficial ownership, but also accounts with common beneficial ownership that is less than 100%.

Q3: May a market participant place, accept or execute simultaneous buy and sell orders for accounts with common beneficial ownership in the same product and expiration month, or option series?

A3: Any market participant who places or accepts buy and sell orders for simultaneous execution that are for accounts with common beneficial ownership, and any market participant who executes such orders, will be in violation of Rule 534 if the execution of the orders yields a wash result and the party knew, or reasonably should have known, that the trades were entered into without the intent to execute bona fide transactions subject to market risk or price competition.

Q4: When receiving simultaneous buy and sell orders placed by another party, does the market participant receiving the orders have any independent obligation to determine whether the orders are bona fide?

A4: Yes. The CFTC has held (see, for example, *In the Matter of Three Eight Corporation)* that market participants, including account executives and floor brokers, who accept simultaneous buy and sell orders for execution have an independent "duty to inquire" about the propriety of such orders.

In the absence of such inquiry, the market participant accepting the orders may be found to have engaged in wash trades if the execution of the orders produces a wash result.

Market participants receiving simultaneous buy and sell orders for execution must make inquiry sufficient to ascertain whether the orders are for accounts with common beneficial ownership. If the buy and sell orders are for an omnibus account, the market participant has a duty to inquire as to whether the orders are for different account owners within the omnibus account.

If a market participant cannot assure themselves that buy and sell orders received for simultaneous execution are for accounts that do not have common beneficial ownership, the market participant may refuse to accept the orders. Accepting or executing simultaneous buy and sell orders without such assurance creates potential regulatory exposure if the execution of the orders yields a wash result.

Q5: In the event buy and sell orders for accounts with common beneficial ownership are simultaneously entered for a legitimate purpose, how should such orders be executed to comply with Rule 534?

A5: In the electronic venue, one of the orders should be entered on the electronic trading platform and executed in full prior to the entry of the second order. This will ensure that the orders are not executed opposite each other and will provide a clear audit trail with respect to the entry and execution of the orders. In this circumstance, a written and timestamped record must be made of any order that is not entered on the electronic platform immediately upon receipt.

In the open outcry venue, the buy and sell orders should be timestamped immediately upon receipt. One of the orders should be entered into the pit, executed and timestamped out prior to submitting the second order to the pit for execution. The second order should be timestamped again when it is submitted to the pit. This methodology will ensure that the orders are not executed opposite each other and the accurate timestamping will provide evidence that the orders were not entered for simultaneous execution.

In either the electronic or open outcry venue, simply ensuring that there is a delay between the entry of the buy and sell orders may not, depending on the terms of the orders, preclude the orders from trading in whole or in part against each other. To the extent that the orders trade opposite each other either directly or indirectly through a common third party, the trade may be deemed an illegal wash trade notwithstanding the fact that the orders were entered at different times.

Additionally, in certain circumstances, simultaneous buy and sell orders for accounts with common beneficial ownership that are contemporaneously executed at nearly the same price, rather than at precisely the same price, may violate the prohibition on wash trades if it is demonstrated that the orders were structured to negate market risk, for example, by requiring that the price difference between the two orders be strictly limited.

Q6: Is it acceptable to contemporaneously enter buy and sell orders for accounts with common beneficial ownership if the buy and sell orders are given to different FCMs or to different floor brokers for execution?

A6: The potential for regulatory exposure in this situation is significant. If the orders trade against each other in whole or in part, or if both orders are executed opposite the same third party, an inference may be drawn that orders were structured with the intent to execute a prohibited wash trade. The fact that the orders were competitively executed without prearrangement may not protect the party entering the orders from liability if the execution of the orders produces a wash result.

Q7: Is it acceptable to enter simultaneous buy and the sell orders for accounts with common beneficial ownership for execution on a discretionary ("DRT") basis?

A7: The entry of simultaneous buy and sell orders for accounts with common beneficial ownership that are entered with instructions giving the executing party discretion over the price and/or time of execution may be viewed, depending on the circumstances, as an implicit request to the executing party to negate market risk. Should the execution of the orders produce a wash result, the parties placing, accepting and executing the orders may be liable for having engaged in an illegal wash trade.

Q8: Are market participants permitted to "freshen" position dates (i.e. liquidating and re-establishing a position) without violating the prohibition on wash trades?

A8: In those products settled via physical delivery against the oldest open long position, CME and CBOT Rule 807 ("Open Long Positions During the Delivery Month") allow for the intraday freshening of position dates. However, trades executed to liquidate and re-establish a position in order to freshen the position's date must be competitively executed and must be clearly independent transactions subject to market risk. Purchases and sales to freshen a position date that are prearranged or otherwise executed pursuant to an express or implied agreement will be deemed to violate the prohibition on wash trades.

Q9: Do block trades between different accounts with common beneficial ownership violate the wash trading prohibition?

A9: Block trades between different accounts with **common beneficial ownership** are prohibited unless:

a) each party's decision to enter into the block trade is made by an independent decision-maker;

b) each party has a legal and independent bona fide business purpose for engaging in the block trade; and

c) the block trade is executed at a fair and reasonable price.

In the absence of satisfying all of the aforementioned requirements, the transaction may constitute an illegal wash trade prohibited by Rule 534.

Q10: If buy and sell orders for accounts with common beneficial ownership are independently initiated by independent decision makers and coincidentally cross in the market, will the trade violate the wash trade prohibition?

A10: Buy and sell orders for accounts with common beneficial ownership that are independently initiated for legitimate and separate business purposes by independent decision makers and which coincidentally cross with each other in the competitive market are not considered wash trades provided that the trade was not prearranged and neither party had knowledge of the other's order or otherwise intended for their order to trade against the other's order. Market participants should be aware, however, that trades between accounts with common beneficial ownership may draw additional regulatory scrutiny and should be prepared to demonstrate that such trades are bona fide. (See also Q12, Q13 and Q14.)

Q11: Under what circumstances does trading opposite one's own order on the electronic platform violate Rule 534?

A11: It is a violation of Rule 534 for an individual to enter an order on the electronic platform that the individual knew or reasonably should have known would trade against their own order resting on the opposite side of the market. The unintentional and incidental matching of buy and sell orders entered by an individual trader on the electronic platform generally will not be considered a violation of Rule 534. However, if such self-matching occurs on more than an incidental basis in the context of the trader's activity or in the context of the particular market's activity, such trades may be deemed to violate the prohibition on wash trades.

It is recommended that individual traders who frequently enter orders on opposing sides of the market that have a tendency to self-match on more than an incidental basis employ functionality that will minimize the potential for their buy and sell orders to match with each other. When employed, CME Group's optional self-match prevention ("SMP") functionality automatically blocks the matching of buy and sell orders for commonly owned accounts that are submitted to Globex with the same SMP ID. Should you have any questions on the registration or operation of CME Group's SMP functionality, please contact CME Global Account Management in the U.S. at (312) 634-8700, in Europe at 44 203 379 3754, or in Asia at 65 6593 5574.

Q12: Is it a violation of Rule 534 if independently initiated orders originating from different proprietary traders within the same firm match against each other?

A12: It is recognized that many firms have proprietary trading operations in which multiple traders making fully independent trading decisions enter orders for a commonly owned account (the firm's proprietary account) that may unintentionally and coincidentally match with each other on the electronic platform. Provided that the respective orders of each independent trader are entered in good faith for the purpose of executing bona fide transactions, are entered without prearrangement, and are entered without the knowledge of the other trader's order, then such trades shall not be considered to violate the prohibition on wash trades.

Similarly, orders generated by algorithms operated and controlled by fully independent traders in different trading groups that unintentionally and coincidentally match with each other will not be considered to be wash trades provided that the orders are initiated in good faith for the purpose of executing bona fide transactions, that the algorithms operate independently of one another, and that the respective trading groups do not have knowledge of one another's orders.

Firms have an obligation to supervise the trading by their employees and algorithms, must be able to demonstrate the independence of the traders/trading groups/algorithms, and should have and enforce policies and procedures that preclude the traders from having access to or knowledge of one another's orders.

Additionally, the operator ID that is tied to the individual or team of individuals (ATS Team) responsible for the entry of the orders must be uniquely identified in accordance with Rule 576 ("Identification of Globex Terminal Operators") and associated Market Regulation Advisory Notices.

Q13: Is it a violation of Rule 534 if orders initiated by one or more automated trading systems that are operated and/or controlled by the same individual or the same trading group match against each other?

A13: If a particular algorithm generates buy and sell orders that would potentially match against each other and such trades occur on more than an incidental basis in the context of the algorithm's activity or in the context of the particular market's activity, the trades may be deemed to violate the prohibition on wash trades. It is recommended in this circumstance that the party(ies)

responsible for the operation of the algorithm employ functionality that will minimize the potential for the algorithm's buy and sell orders to match with each other.

If otherwise independent algorithms are operated and/or controlled by the same individual or team of individuals and the algorithms trade against one another on more than an incidental basis in the context of the algorithms' activity or the particular market's activity, then the trading between the algorithms may be deemed to violate the prohibition on wash trades. Where multiple algorithms operated or controlled by the same individual or team of individuals may generate self-match events on more than an incidental basis, it is recommended that the individual or team employ functionality to minimize or eliminate such occurrences.

Q14: Are there unique considerations with respect to Rule 534 in the context of exchange-sponsored volume incentive programs?

A14: Market participants who participate in exchange-sponsored programs with incentives tied in whole or in part to meeting specific volume thresholds should take proactive steps to prevent transactions between accounts with common beneficial ownership. These trades will draw additional regulatory scrutiny and it is recommended that participants in these types of incentive programs employ functionality to mitigate the potential for such trades to occur.

Q15: In circumstances where "more than incidental" self-matching may be deemed to violate the prohibition on wash trades, is there a prescribed threshold?

A15: In these circumstances, market participants are responsible for monitoring their trading, whether that trading is manual or automated, and are responsible for minimizing the potential for, and the occurrence of, self-match events.

The incidence of self-matching in these circumstances will be evaluated in the context of the activity of the trader, trading group, or algorithm(s), and relative to the trades and volume in the instrument traded. More than de minimis self-matching in this context will result in additional regulatory scrutiny and may be deemed to violate the prohibition on wash trades; if there is the potential for more than de minimis self-match events, market participants are expected to either adjust their trading strategies or employ functionality to mitigate the occurrence of self-match events.

Q16: Is the use of CME Group's Self-Match Prevention functionality mandatory?

A16: Use of CME Group's SMP functionality is optional. Each firm has the flexibility to tailor its application of the functionality and its use of SMP IDs in ways that are suitable for its particular business model and trading strategies. Contact CME Global Account Management for more information regarding SMP ID configuration. CME Group SMP frequently asked questions and answers can be found here: http://www.cmegroup.com/globex/trade-on-cme-globex/self-match-faq.html

Market participants are reminded, however, that the rules of all CME Group Exchanges, as well as the Commodity Exchange Act, prohibit illegal wash trades. Firms and market participants should carefully review their operations and the guidance in this Advisory Notice, and, where appropriate, take steps necessary to minimize the potential for such trades either through the use of SMP functionality or by alternative means.

Q17: Does employing CME Group Self-Match Prevention functionality prevent all potential self-match events?

A17: CME Group's SMP functionality will not prevent self-matches in markets operating with implied spread functionality if the trade involves an implied order. Absent evidence to the contrary, self-

match events involving implied orders will be deemed unintentional by the CME Group Exchanges. Additionally, CME Group's SMP functionality does not operate during the Globex pre-open nor does it prevent self-matches of orders entered during the pre-open state when the market opens.

Q18: Is it a violation of Rule 534 if resting orders in the order book entered during the Globex pre-open match opposite one another once the market opens?

A18: Please see the CME Group Market Regulation Advisory Notice on order entry during the CME Globex pre-open period.

Q19: What is an indirect wash trade?

A19: One or more purchases (sales) opposite a counterparty followed by a sale (purchase) at the same or similar price opposite the same or different counterparties may be deemed an "indirect wash trade" in violation of Rule 534 if the orders are entered with the intent to negate or strictly limit market risk. Such intent exists if the party knew or should have known that the orders would negate or strictly limit market risk. Additionally, no person is permitted to accept, execute or accommodate the execution of such orders with knowledge of their character. For additional information on indirect wash trades, please see the examples following the answer to FAQ 21 at the end of this Advisory Notice.

Q20: Does an indirect wash trade have to be prearranged in order to constitute a violation of Rule 534?

A20: No. An indirect wash trade does not require prearrangement to constitute a violation of Rule 534 if the person knows or reasonably should know that the purpose of the orders is to avoid taking a bona fide market position exposed to market risk.

Q21: What are serial indirect wash trades and do such trades violate Rule 534?

A21: A series of trades executed among a group of market participants where order entry and trade activity is concentrated in discrete and limited periods of time may be deemed "serial indirect wash transactions" in violation of Rule 534 to the extent that the parties know or reasonably should know that the purpose of the trades is to avoid taking a bona fide market position exposed to market risk.

Examples of Prohibited Indirect Wash Activity

- Participant A and B hold open long positions in the same physically deliverable commodity in the delivery month where delivery takes place against the oldest open long position. To reduce the risk of being stopped for delivery, Participant A and B pre-arrange the execution of transactions that have the effect of offsetting and re-establishing one or both of their long positions, thus freshening the position dates. For example, in an initial transaction, Participants A and B knowingly trade opposite each other in the market. In a subsequent transaction, typically close in time to the initial transaction, Participants A and B knowingly execute an offsetting transaction opposite each other at or near the same price as the initial transaction. In this transaction set, the sells had the effect of offsetting the pre-existing long positions and the buys had the effect of re-establishing the long positions with newer position dates. Due to the manner in which the transactions were orchestrated, Participants A and B negated or strictly limited market risk. This set of transactions constitutes an indirect wash in violation of Rule 534.

- Participants A, B, and C participate in an incentive or rebate program where terms or conditions of the program require each participant to meet a volume threshold (e.g. average daily volume; monthly

volume; passively traded volume; etc.). *With or without pre-arrangement*, Participants A, B, and/or C execute a series of transactions, typically in close time proximity, where they buy and sell similar quantities at the same or similar prices opposite each other and where, at the conclusion of the transaction series, the participants had no net change in position. Based on factors including, but not limited to, prior trading activity, market circumstances, market knowledge, or prearrangement the participants know or have reason to know the transactions would not be exposed to price competition or the positions exposed to market risk. Transactions executed for the purpose of increasing volume, while knowing or having reason to know the transactions would not be exposed to price competition or the positions exposed to market risk, are considered indirect wash trades in violation of Rule 534.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX, COMEX**
Subject	**Order Routing/Front-End Audit Trail Requirements**
Rule References	**Rule 536.B.**
Advisory Date	**September 2, 2020**
Advisory Number	**CME Group RA2009-5**
Effective Date	**September 17, 2020**

Effective on trade date September 17, 2020, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1913-5 from December 17, 2019. It is being issued based on amendments to Rule 536.B. ("Globex Order Entry") in connection with the migration from iLink 2 to iLink 3.

No substantive information in this Advisory Notice has been amended.

CME, CBOT, NYMEX and COMEX Rule 536.B.2. ("Globex Order Entry – Electronic Audit Trail Requirements for Electronic Order Routing/Front-End Systems") requires that the electronic audit trail associated with any system that accesses the CME Globex platform through the CME iLink® gateway contain a complete and accurate record of all activity through that connection, and account for every electronic communication by the order routing or front-end system from the time such order routing or front-end system receives or generates an electronic communication until it is communicated to CME Globex. Further, the Rule requires that CMFs guaranteeing a connection to CME Globex are responsible for maintaining, or causing to be maintained, the electronic audit trail for a minimum of 5 years.

Firms responsible for the order routing/front-end audit trail of a trading system that accesses CME Globex through the CME iLink® gateway must have the ability to display data in the required format. Exchange Drop Copy messages or files do not meet the requirements of Rule 536.B.2., as Drop Copy only reflects an Exchange-level audit trail and will not include information internal to the firm's system. Further, the connected entity must ensure that **all trading functionality supported by the system** is appropriately reflected in the audit trail. For the convenience of those responsible for such order routing or front-end systems, the Exchanges have updated the CME Group Client Systems Wiki with the new data definitions, required format, and validation rules applied through the certification process of the minimum acceptable audit trail elements that such systems must capture.

CME Group Market Regulation performs annual reviews of order routing/front-end audit trails to validate that certified systems capture data in accordance with the minimum acceptable audit trail elements.

Responsibility for Preserving Audit Trails

CMFs guaranteeing a connection to Globex are responsible for maintaining or causing to be maintained the order routing/front-end system audit trail for all electronic orders (except in the circumstance below where the CMF's client is another CMF or an Equity Member Firm), including order entry, modification, cancellation, and responses to such messages (referred to as the "electronic audit trail"), entered into the Globex platform through the CME iLink® gateway. While CMFs are responsible for this audit trail, many firms outsource the preservation of the audit trail to a vendor, or require that their directly connected clients bear the cost of maintaining this data.

In the case where the Guaranteeing CMF has a direct connect client that is another CMF or an Equity Member Firm, the Guaranteeing CMF may notify the client CMF or Equity Member Firm that it is their obligation to maintain the audit trail. Upon execution of a written notice, it shall be the duty of the client CMF or Equity Member Firm to maintain an electronic audit trail pursuant to this rule.
When a new connection is made to CME Globex, connecting entities must provide a sample audit trail report from the test/certification environment before the system accesses the live environment. Shortly

after the new system is deployed in the live environment, the connecting entity or the clearing firm is required to provide the Market Regulation Department with a full production audit trail report. The purpose of this review is to verify that the connecting entity's audit trail meets the minimum data requirements, and that it can be produced in a standard human readable format. Questions regarding the submission of sample or production audit trail reports should be sent to AuditTrail@CMEGroup.com.

The text of CME, CBOT, NYMEX and COMEX Rule 536.B. appears below.

536.B. Globex Order Entry

1. General Requirement

Each Globex Terminal Operator entering orders into Globex shall accurately input for each Application Message all fields required to be populated by the CME iLink® Message Specifications set forth in the CME Group Client Systems Wiki in effect at the time, including, but not limited to the: operator ID; price; quantity; product; expiration month; CTI code; manual order indicator; and account number (except as provided in Section C), and, for options, put or call and strike price. The Globex Terminal Operator's operator ID must be present on each Application Message, including order messages, submitted to Globex. For a Globex Terminal Operator with access pursuant to Rule 574, the clearing member that guarantees such access to Globex will be responsible for the Globex Terminal Operator's compliance with this rule with respect to the following fields: operator ID, CTI code, manual order indicator and account number. Notwithstanding, and in accordance with Rule 574, a clearing member must take appropriate action if it has actual or constructive knowledge that a Globex Terminal Operator has failed to accurately input for each Application Message fields required to be populated by this rule.

With respect to orders received by a Globex Terminal Operator which are capable of being immediately entered into Globex, no record other than that set forth above need be made. However, if a Globex Terminal Operator receives an order which cannot be immediately entered into Globex, the Globex Terminal Operator must prepare a written order and include the account designation, date, time of receipt and other information required pursuant to section A.1. above. The order must be entered into Globex when it becomes executable.

2. Electronic Audit Trail Requirements for Electronic Order Routing/Front-End Systems

Entities certified by the Exchange to connect an order routing/front-end system to the Globex platform through the CME iLink® gateway are responsible for causing an audit trail of each message entered into Globex to be created. Clearing members guaranteeing a connection to Globex are responsible for maintaining or causing to be maintained the electronic audit trail for such systems. This electronic audit trail must be maintained for a minimum of 5 years, and clearing members must have the ability to produce this data in a standard format upon request of Market Regulation.

Each such electronic audit trail must be complete and accurate and account for every electronic communication such system sends to or receives from Globex.

This electronic audit trail must contain all order entry, order modification, and Globex response receipt times to the highest level of precision achievable by the operating system, but at least to the millisecond. The times captured must not be able to be modified by the person entering the order. The data must also contain all required information and fields which include, but not limited to, the following:

a record of all fields relating to order entry, including transaction date, product, Exchange code, expiration month, quantity, order type, order qualifier, price, buy/sell indicator, stop/trigger price, order number, unique transaction number, account number, session ID, operator ID, manual order indicator, self-match prevention ID where applicable, host order number, trader order number, clearing member, type of action, action status code, customer type indicator, origin, and timestamps. For executed orders the audit trail must record the execution time of the trade along with all fill information.

In the case where the guaranteeing Clearing Firm has a direct connect client that is another Clearing Firm or an Equity Member Firm, the Clearing Firm may notify the client Clearing Firm or Equity Member Firm that it is their obligation to maintain the electronic audit trail. Upon execution of this written notice, it shall be the duty of the client Clearing Firm or Equity Member Firm to maintain an electronic audit trail pursuant to this rule. Nothing herein relieves any of the above-referenced firms from compliance with the applicable recordkeeping provisions of CFTC Regulations, including Regulation 1.31 or 1.35.

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

Terry Quinn, Manager, 312.435.3753

Laetizia Moreau, Executive Director, 312.435.3619

For media inquiries concerning this Market Regulation Advisory Notice please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Documentation of Customer Orders and Submission of Suspense Accounts on CME Globex**
Rule References	**Rule 536**
Advisory Date	**August 30, 2021**
Advisory Number	**CME Group RA2115-5**
Effective Date	**October 1, 2021**

Effective on trade date Friday, October 1, 2021, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2011-5 from September 2, 2020. It is being issued based on amendments to CBOT Rule 536.C. ("Bunched Orders and Orders Eligible for Post Execution Allocation"") in connection with the September 30, 2021, closure of the trading floor for all products other than options on CME Eurodollar futures and options on CME SOFR futures.

No substantive information in this Advisory Notice has been amended.

Since October 1, 2018, this Advisory Notice has set forth the circumstances under which a suspense account may be submitted on orders entered into CME Globex ("Globex") and the requirements attendant to proper documentation of such orders. For purposes of this Advisory Notice, a suspense account means a temporary holding account that is submitted at the time of order entry into Globex but prior to the allocation of the executions to the specific accounts on a carrying Clearing Member Firm's books.

No other material changes have been made to the Advisory Notice.

The text of Rule 536.B. ("Globex Order Entry") and Rule 536.C. ("Bunched Orders and Orders Eligible for Post Execution Allocation") which are, in part, applicable to the use of suspense accounts, begins on page 5. A Frequently Asked Questions ("FAQ") section begins on page 8.

This MRAN does not apply to 1) the entry of block trades and Exchange for Related Position Transactions ("EFRPs") submitted via CME ClearPort/CME Direct and 2) trades executed via open outcry in a trading pit.

Entry of Suspense Accounts into Globex

The Exchanges recognize the following five circumstances where a suspense account may be used at the time of order entry into Globex, subject to the requirements and limitations set forth in this Advisory Notice:

- Orders entered by or on behalf of an Eligible Account Manager ("EAM") that has written investment discretion over the accounts of customer(s) ("EAM-Specific Suspense Accounts");

- Bunched DRT orders for multiple customers where the resulting trades are subject to a written pre-determined allocation scheme ("Bunched DRT Suspense Accounts");

- Orders subject to a written pre-determined allocation scheme ("Pre-Determined Allocation Scheme Suspense Accounts");
- Bunched Request for Cross ("RFC") orders ("Bunched RFC Order Suspense Accounts"); and

- *De minimis* usage for orders entered by Execution Operations ("Execution Operation Suspense Accounts")

Unless otherwise provided below, Market Regulation will conduct examinations of Exchange Clearing Member Firms and their guaranteed introducing brokers ("IBs") related to their usage of suspense accounts. The use of suspense accounts must comport with the requirements detailed in this Advisory Notice and such use is subject to a heightened level of regulatory scrutiny. **No other use of suspense accounts for order entry into Globex is permitted.**

EAM-Specific Suspense Accounts

Persons or entities that qualify as an EAM, as defined in CFTC Regulation 1.35(b)(5)(i), with written investment discretion regarding participating customer accounts may enter orders for those customers, including bunched orders on behalf of multiple customers, into Globex using a suspense account. An EAM that has granted written investment discretion to another EAM is considered a customer of that other EAM. In all cases, the suspense account must be unique to the EAM responsible for the order entry. For purposes of this Advisory Notice, this is referred to as an "EAM-Specific Suspense Account." Any post-execution allocation of the resulting executions must be done in compliance with CFTC Regulation 1.35(b)(5) and the National Futures Association Interpretive Notice related to National Futures Association ("NFA") Compliance Rule 2-10, including recordkeeping requirements.

Bunched DRT Suspense Accounts

A DRT order (Disregard Tape or Not-Held Order) means an order placed by an account owner or controller that gives a person complete discretion over price and time in the execution of the order, including discretion to execute all, some, or none of the order.

A person in possession of DRT orders for multiple customers may bunch those orders and enter them into Globex using a suspense account provided the following conditions are met:

1. The account owner or controller must have consented to having its orders bunched with other DRT orders and must further have consented to having its trade executions average priced with the trade executions of the other orders included in the bunched order.

2. The person bunching the DRT orders must create, prior to the entry of the bunched DRT order into Globex, a written or electronic record of each underlying customer order in accordance with Rule 536.B.1. The underlying customer order must reflect that the order was a DRT order and include an electronic timestamp reflecting the date and time the order was received and the customer-specific account designation.

3. The person bunching the DRT orders or entering the bunched DRT order into Globex must use a suspense account that specifically identifies or is unique to the person responsible for the bunching of the DRT orders. That suspense account must be used solely for bunching DRT orders.

4. Prior to the entry of a bunched order into Globex, the executing Clearing Member Firm must be provided the methodology to be used to allocate the trade executions to the customer accounts participating in the bunched DRT order. The methodology must address how trade executions should be allocated in instances where only part of the bunched DRT order is executed.

5. All trade executions for the bunched DRT orders must be averaged priced in accordance with Rule 553 ("Average Price System") prior to the allocation of the executions to the underlying customer accounts.

6. A person bunching DRT orders must make the executing Clearing Member Firm and any carrying Clearing Member Firms aware that it is engaged in bunching DRT orders.

Pre-Determined Allocation Scheme Suspense Accounts

Orders subject to a pre-determined allocation scheme may be entered into Globex using a suspense account provided the following conditions are met:

1. Each allocation scheme must use a unique suspense account. The Pre-Determined Allocation Scheme Suspense Account may not be used for orders not subject to the allocation scheme.

2. Prior to the entry of orders into Globex, the executing Clearing Member Firm must be provided the pre-determined allocation scheme to be used for the resulting trade executions.

3. Each customer or participant must consent to having their orders subjected to the pre-determined allocation scheme.

4. The executing Clearing Member Firm must maintain records of all Pre-Determined Allocation Scheme Suspense Accounts and their pre-determined allocation schemes for a minimum of five years.

Bunched RFC Order Suspense Accounts

In those circumstances where order entry into Globex occurs via the submission of a Request for Cross ("RFC") (an order which contains both the buy and the sell orders) pursuant to the requirements of Exchange Rule 539.C. ("Pre-Execution Communications Regarding Globex Trades"), a broker may bunch multiple market maker orders for the purpose of satisfying the terms of a single customer order and enter the bunched market maker order using a Bunched RFC Order Suspense Account.

The Bunched RFC Order Suspense Account may not be used to represent the customer side of the RFC order. Where a Bunched RFC Order Suspense Account is used on the market maker side of the order, brokers must ensure that the market maker orders are documented in accordance with Rule 536.B.1 with specific market maker account identifiers on the order tickets. Brokers must obtain a Bunched RFC Orders Suspense Account, unique to the individual broker placing the bunched RFC orders from their Clearing Member Firm and may use that suspense account solely for purposes of entering the bunched market maker orders on one side of an RFC. Allocations to end-clients are required to be completed in the CME clearing system before the end of the clearing session for that trade date.

Execution Operation Suspense Accounts

For operations that provide order execution services for customers ("Execution Operations"), orders must generally be entered into Globex using a customer-specific account number or short code on each order entry at the time of entry into Globex. Where the order is entered immediately upon receipt and the order entry includes the customer-specific account number or short code, the Execution Operation has met its order documentation requirements as defined below and as set forth in Rule 536.B.

Orders received by an Execution Operation from an EAM with discretion over the customer account(s) represented by the order must be entered into Globex using a suspense account specifically identifying or mapping to the EAM responsible for the order or using the customer-specific account number or short code.

Recognizing that on occasion a customer-specific or EAM-specific account may not be available at the time an order is entered into Globex, *de minimis* usage of an Execution Operation Suspense Account will be permitted, provided the following requirements are met.

1. If a general suspense account is used rather than a customer-specific or EAM-specific account, the Execution Operation must create, prior to order entry, a written or electronic record of the order in accordance with Rule 536.B.1. The order must reflect the time of receipt of the order and a customer-specific or EAM-specific account designation.

2. The general suspense account must be unique to the desk or group of the Execution Operation submitting the order into Globex.

Market Regulation will conduct examinations of the usage of Execution Operation Suspense Accounts by Exchange Clearing Member Firms, their guaranteed IBs, as well as floor-based member-owned Globex Execution Operations. The examination will include a recordkeeping review to verify written or electronic records of the order are created and maintained in accordance with Rule 536.B.1.

The examination will also include a review to determine whether the Execution Operation Suspense Accounts were used on more than a *de minimis* basis. In considering whether usage was more than *de minimis*, Market Regulation will consider a variety of factors, including whether the orders and or trades were for new accounts where account information may not have been available to the Globex terminal operator.

Limitations Applicable to All Suspense Accounts

Except for a Commodity Trading Advisor ("CTA") who has permission of its customer(s), no other person or entity is allowed to enter customer orders into a suspense account that is also used for personal or proprietary orders of the party entering the order (i.e. where the resulting trades will be given-up or allocated to an account in which the party entering the order has an ownership or financial interest).

For instances where the resulting trades will be given-up from the executing firm to a carrying Clearing Member Firm, the executing firm must be a party to a written agreement with the carrying Clearing Member Firm pursuant to CFTC Regulation 1.73, where applicable.

Exchange Clearing Member Firm Requirements Concerning Suspense Account Records

Exchange Clearing Member Firms are reminded of the requirement to provide, upon request from Market Regulation, records of all suspense accounts used at the firm.

The records must include the account number, the name of the party it represents, the name of the entity using it for submitting orders, the type of suspense account, and where applicable, any pre-determined allocation scheme associated with the suspense account. Additionally, if a short code is used at order entry for a customer, the Exchange Clearing Member Firm must maintain a record of the account number(s) to which the short code maps. Exchange Clearing Member Firms should maintain procedures related to the assignment, collection and preservation of records and documentation, and monitoring the use of suspense accounts. Exchange Clearing Member Firms must be able to produce these records in a standard format upon request of Market Regulation.

CME

536.B. Globex Order Entry

1. General Requirement

Each Globex Terminal Operator entering orders into Globex shall accurately input for each Application Message all fields required to be populated by the CME iLink® Message Specifications set forth in the CME Group Client Systems Wiki in effect at the time, including, but not limited to the: operator ID; price; quantity; product; expiration month; CTI code; manual order indicator; and account number (except as provided in Section C), and, for options, put or call and strike price. The Globex Terminal Operator's operator ID must be present on each Application Message, including order messages, submitted to Globex. For a Globex Terminal Operator with access pursuant to Rule 574, the clearing member that guarantees such access to Globex will be responsible for the Globex Terminal Operator's compliance with this rule with respect to the following fields: operator ID, CTI code, manual order indicator and account number. Notwithstanding, and in accordance with Rule 574, a clearing member must take appropriate action if it has actual or constructive knowledge that a Globex Terminal Operator has failed to accurately input for each Application Message fields required to be populated by this rule.

With respect to orders received by a Globex Terminal Operator which are capable of being immediately entered into Globex, no record other than that set forth above need be made. However, if a Globex Terminal Operator receives an order which cannot be immediately entered into Globex, the Globex Terminal Operator must prepare a written order and include the account designation, date, time of receipt and other information required pursuant to section A.1. above. The order must be entered into Globex when it becomes executable.

2. Electronic Audit Trail Requirements for Electronic Order Routing/Front-End Systems

Entities certified by the Exchange to connect an order routing/front-end system to the Globex platform through the CME iLink® gateway are responsible for causing an audit trail of each message entered into Globex to be created. Clearing members guaranteeing a connection to Globex are responsible for maintaining or causing to be maintained the electronic audit trail for such systems. This electronic audit trail must be maintained for a minimum of 5 years, and clearing members must have the ability to produce this data in a standard format upon request of Market Regulation.

Each such electronic audit trail must be complete and accurate and account for every electronic communication such system sends to or receives from Globex.

This electronic audit trail must contain all order entry, order modification, and Globex response receipt times to the highest level of precision achievable by the operating system, but at least to the millisecond. The times captured must not be able to be modified by the person entering the order. The data must also contain all required information and fields which include, but not limited to, the following:

a record of all fields relating to order entry, including transaction date, product, Exchange code, expiration month, quantity, order type, order qualifier, price, buy/sell indicator, stop/trigger price, order number, unique transaction number, account number, session ID, operator ID, manual order indicator, self-match prevention ID where applicable, host order number, trader order number, clearing member, type of action, action status code, customer type indicator, origin, and timestamps. For executed orders the audit trail must record the execution time of the trade along with all fill information.

In the case where the guaranteeing Clearing Firm has a direct connect client that is another Clearing Firm or an Equity Member Firm, the Clearing Firm may notify the client Clearing Firm or Equity Member Firm that it is their obligation to maintain the electronic audit trail. Upon execution of this written notice, it shall be the duty of the client Clearing Firm or Equity Member Firm to maintain an electronic audit trail pursuant to this rule. Nothing herein relieves any of the above-referenced firms from compliance with the applicable recordkeeping provisions of CFTC Regulations, including Regulation 1.31 or 1.35.

536.C. Bunched Orders and Orders Eligible for Post Execution Allocation

Bunched orders must be allocated and recorded in accordance with CFTC Regulation 1.35(b) and the NFA's Interpretive Notice related to Compliance Rule 2-10. A bunched order for pit execution does not require the specific account number to be recorded at the time of order placement or upon the report of execution provided that 1) the order is being placed by an eligible account manager for multiple accounts eligible for post execution allocation or 2) a written, pre-determined allocation scheme has been provided to the futures commission merchant accepting or clearing the order prior to the time the order has been placed. Additionally, at the time of receipt on the trading floor, bunched orders that do not contain specific account numbers must contain a series, group, or suspense account indicator which relates directly to the group of accounts for which the order has been placed. A bunched order may be initially cleared into a suspense account provided that the final account-specific allocations are submitted to the clearing system no later than the end of each trading day.

Bunched orders for non-discretionary accounts may be entered for pit execution; however, only the following order types may be bunched: Market on Open, Market on Close, same priced Limit Orders and same priced Stop Orders. Such non-discretionary orders may only be bunched in the following instances:

a. Each order underlying the bunched order must be reduced to writing and include the information required pursuant to Section A.1. above;
b. Allocation of the executions for the bunched orders must be fair and equitable in accordance with the NFA's Interpretive Notice related to Compliance Rule 2-10; and
c. In circumstances where the order is bunched in a member firm's sales office, the party accepting the order must, contemporaneously with the order placement, transmit the individual account numbers and quantities associated with the bunched order to the clearing member firm. Such transmission shall be maintained by the clearing member firm along with the bunched order.

With respect to bunched Globex orders, such orders may be entered using a series designation or suspense account number provided that 1) the order is being placed by an eligible account manager for multiple accounts eligible for post execution allocation or 2) a written, pre-determined allocation scheme that defines the series has been provided to the futures commission merchant accepting or clearing the order prior to the time that such order is entered. In the latter case, if such information has not been provided to the futures commission merchant prior to the time of order entry, each specific account number must be entered into Globex. Additionally, for all such bunched orders executed on Globex, the final account specific allocations must be submitted to the clearing system no later than the end of each trading day.

CBOT and NYMEX/COMEX

536.B. Globex Order Entry

1. General Requirement

Each Globex Terminal Operator entering orders into Globex shall accurately input for each Application Message all fields required to be populated by the CME iLink® Message Specifications set forth in the CME Group Client Systems Wiki in effect at the time, including, but not limited to the: operator ID; price; quantity; product; expiration month; CTI code; manual order indicator; and account number (except as provided in Section C), and, for options, put or call and strike price. The Globex Terminal Operator's operator ID must be present on each Application Message, including order messages, submitted to Globex. For a Globex Terminal Operator with access pursuant to Rule 574, the clearing member that guarantees such access to Globex will be responsible for the Globex Terminal Operator's compliance with this rule with respect to the following fields: operator ID, CTI code, manual order indicator and account number. Notwithstanding, and in accordance with Rule 574, a clearing member must take appropriate action if it has actual or constructive knowledge that a Globex Terminal Operator has failed to accurately input for each Application Message fields required to be populated by this rule.

With respect to orders received by a Globex Terminal Operator which are capable of being immediately entered into Globex, no record other than that set forth above need be made. However, if a Globex Terminal Operator receives an order which cannot be immediately entered into Globex, the Globex Terminal Operator must prepare a written order and include the account designation, date, time of receipt and other information required pursuant to section A.1. above. The order must be entered into Globex when it becomes executable.

2. Electronic Audit Trail Requirements for Electronic Order Routing/Front-End Systems

Entities certified by the Exchange to connect an order routing/front-end system to the Globex platform through the CME iLink® gateway are responsible for causing an audit trail of each message entered into Globex to be created. Clearing members guaranteeing a connection to Globex are responsible for maintaining or causing to be maintained the electronic audit trail for such systems. This electronic audit trail must be maintained for a minimum of 5 years, and clearing members must have the ability to produce this data in a standard format upon request of Market Regulation.

Each such electronic audit trail must be complete and accurate and account for every electronic communication such system sends to or receives from Globex.

This electronic audit trail must contain all order entry, order modification, and Globex response receipt times to the highest level of precision achievable by the operating system, but at least to the millisecond. The times captured must not be able to be modified by the person entering the order. The data must also contain all required information and fields which include, but is not limited to the following:

a record of all fields relating to order entry, including transaction date, product, Exchange code, expiration month, quantity, order type, order qualifier, price, buy/sell indicator, stop/trigger price, order number, unique transaction number, account number, session ID, operator ID, manual order indicator, self-match prevention ID where applicable, host order number, trader order number, clearing member, type of action, action status code, customer

type indicator, origin, and timestamps. For executed orders the audit trail must record the execution time of the trade along with all fill information.

In the case where the guaranteeing Clearing Firm has a direct connect client that is another Clearing Firm or an Equity Member Firm, the Clearing Firm may notify the client Clearing Firm or Equity Member Firm that it is their obligation to maintain the electronic audit trail. Upon execution of this written notice, it shall be the duty of the client Clearing Firm or Equity Member Firm to maintain an electronic audit trail pursuant to this rule. Nothing herein relieves any of the above-referenced firms from compliance with the applicable recordkeeping provisions of CFTC Regulations, including Regulation 1.31 or 1.35.

536.C. Bunched Orders and Orders Eligible for Post Execution Allocation

Bunched orders must be allocated and recorded in accordance with CFTC Regulation 1.35(b) and the NFA's Interpretive Notice related to Compliance Rule 2-10.

With respect to bunched Globex orders, such orders may be entered using a series designation or suspense account number provided that 1) the order is being placed by an eligible account manager for multiple accounts eligible for post execution allocation or 2) a written, pre-determined allocation scheme that defines the series has been provided to the futures commission merchant accepting or clearing the order prior to the time that such order is entered. In the latter case, if such information has not been provided to the futures commission merchant prior to the time of order entry, each specific account number must be entered into Globex. Additionally, for all such bunched orders executed on Globex, the final account specific allocations must be submitted to the clearing system no later than the end of each trading day.

Frequently Asked Questions (FAQ)

Documentation of Customer Orders and Submission of Suspense Accounts on CME Globex

1. What is a suspense account?

A suspense account is a generic account used at the time of order entry into Globex to temporarily hold a trade execution that is subsequently allocated to a customer specific account. Only the following five types of suspense accounts are permitted by Market Regulation:

- EAM-Specific Suspense Accounts
- Bunched DRT Suspense Accounts
- Pre-Determined Allocation Scheme Suspense Accounts
- Bunched RFC Order Suspense Accounts
- Execution Operation Suspense Accounts

In all other circumstances, a customer-specific account number must be used at the time of order entry into Globex.

2. What is a short code?

A short code is a customer-specific identifier used at order entry in lieu of the actual customer account number. A customer-specific short code is not considered a suspense account. If a unique customer-specific short code is used at order entry and the order is entered into Globex immediately upon receipt from the customer, the executing entity has met its order documentation requirements. If the order is not immediately entered upon receipt, a timestamped order ticket must be generated and maintained pursuant to Rule 536.B.1.

3. Who qualifies as an Eligible Account Manager ("EAM") for purposes of using an EAM-Specific Suspense Account?

Those individuals and entities qualifying as an Eligible Account Manager ("EAM") pursuant to CFTC Regulation 1.35.

4. What type of information must be maintained with respect to the use of suspense accounts?

Exchange Clearing Member Firms should be able to produce records for any order entry into Globex using a suspense account for up to five years, with records for the most recent four months of activity readily available. Firms must have the ability to produce the following records in a standard format upon request from Market Regulation:

- Type of suspense account
- Suspense account number
- Name/description of executing party authorized to use the suspense account:
    - Associated National Futures Association ("NFA") ID and/or US Securities and Exchange Commission ("SEC") #, if any
    - EAM Type, if any
- Name/description of party represented by the suspense account
    - Associated NFA ID and/or SEC #, if any; and
    - EAM Type, if any
- Where applicable, any pre-determined allocation scheme associated with the suspense account.

Market Regulation will conduct examinations of Exchange Clearing Member Firms and their guaranteed introducing brokers for their compliance with this rule.

5. What are the recordkeeping requirements for Execution Operation Suspense Account usage?

For orders entered into Globex using an Execution Operation Suspense Account, a written or electronic record must be created or captured prior to order entry. Documentation of such orders may include any of the following records: written order tickets, instant messages, recorded phone calls, or emails.

It is important to note that such records must contain the time the order was received as well as an account identifier which represents the customer that originated the order. Upon examination, it should be clear to Market Regulation when the order was received and who originated the order.

6. How should a DRT order be documented by a party using a Bunched DRT Suspense Account?

Each underlying order of a bunched DRT order must have a designation of "DRT." Parties may write "DRT" on an order ticket, communicate the order is "DRT" on electronic communications including an email or instant message, or verbally confirm "DRT" on a recorded phone line.

7. What is a Letter of Direction ("LOD"), and may a firm use a suspense account for the entry of multiple orders executed pursuant to LODs?

A LOD is typically an authorization from a customer granting limited power of attorney and discretion to a broker or futures commission merchant ("FCM") to enter orders in accordance with signals and/or recommendations generated by a trading system developed by the customer or licensed or purchased from a third party by the customer. To the extent the person or entity entering the orders generated by such system(s) is an EAM, an EAM-Specific Suspense Account may be used at order entry, including instances where the EAM bunches orders on behalf of multiple customers. If the person or entity entering the orders generated by such system(s) is not an EAM and intends to bunch orders from multiple customers, all requirements for Bunched DRT Orders must be satisfied.

8. What is a Pre-Determined Allocation Scheme?

A Pre-Determined Allocation Scheme is a detailed description of how order executions should be allocated to underlying customer accounts. The scheme should contain the identity or account number of each underlying customer, the quantity to be allocated, and the method of allocation in the event of a partial fill. Executing Clearing Member Firms must be provided with such details prior to entering orders into a Pre-Determined Allocation Scheme Suspense Account, and the allocations should not deviate from the scheme without the executing Clearing Member Firm being notified of the changes to the scheme prior to the time the orders are entered into Globex.

9. May an execution operation use an Execution Operation Suspense Account when entering orders into Globex where the customer is an EAM?

Generally, the firm must use a customer-specific account number or an account number that represents the EAM utilizing the services of the execution operation. Recognizing that on occasion a customer-specific or EAM-specific account number may not be available at the time an order is entered into Globex, an Execution Operation Suspense Account may be used on a de minimis basis for entry of such orders into Globex.

10. At what entity level is the usage of Execution Operation Suspense Accounts measured in order to ensure it remains de minimis?

The usage of Execution Operation Suspense Accounts will be measured at the executing level. The executing level may be the NFA registered entity utilizing the suspense account or individual members utilizing the suspense account while acting as an execution operation. Affiliates of Exchange Clearing Member Firms registered under separate NFA IDs will be measured separately.

11. May orders for the personal trading accounts of an employee of an execution operation be entered using an Execution Operation Suspense Account?

No. The employees or agents of an execution operation may not enter orders for their own trading accounts or the trading accounts of any other execution operation employee or agent into Globex using an Execution Operation Suspense Account.

12. What types of violations regarding the use of suspense accounts will Market Regulation seek to identify?

Market Regulation's review of suspense accounts usage will be focused on, but not limited to, identifying the following types of violations:

- **All Suspense Accounts**
  - Failure to maintain or adhere to firm procedures
  - Failure to maintain records of suspense accounts used by the firm
  - Failure to identify a suspense account
  - Violation of personal trading restrictions

- **Bunched DRT Suspense Accounts**
  - Improper Use:
    - Bunching customer orders without customer consent
    - Executing non-bunched orders
  - Missing required documentation
  - Inaccurate Documentation:
    - Missing time of receipt indication
    - Time of receipt indication after order entry
    - Missing or invalid customer-specific account designation
    - Missing "DRT" designation
  - Failure to provide the executing Clearing Member Firm, prior to the entry of a bunched order into Globex, the methodology to be used to allocate the trade executions to the customers participating in the bunched order.
  - Failure to average price the order(s) prior to the allocation to underlying customer accounts.

- **Pre-Determined Allocation Scheme Suspense Accounts**
  - Improper Use:
    - Used for multiple schemes or orders that are not a part of the scheme
    - Subjecting customer orders to a pre-determined allocation scheme without consent.
  - Failure to provide the executing firm, prior to order entry, with the pre-determined allocation scheme.
  - Failure to maintain records of schemes for a minimum of 5 years.

- **Bunched RFC Order Suspense Accounts**
  - Improper Use:
    - Used to represent the customer side of an RFC order.
    - Used for non-RFC orders
  - Missing required documentation
  - Inaccurate Documentation:
    - Missing time of receipt indication
    - Time of receipt indication after order entry
    - Missing or invalid customer-specific account designation
    - Missing or invalid market maker identifiers

- **Execution Operation Suspense Accounts**
  - Improper Use:
    - Exceeding de minimis usage
    - Violating personal trading restrictions
  - Missing required supporting documentation
  - Inaccurate documentation
    - Missing time of receipt indication
    - Time of receipt indication after order entry
    - Missing or invalid customer-specific account designation

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

Terrence Quinn, Manager, Data Investigations, 312.435.3753

Laetizia Moreau, Executive Director, Data Investigations, 312.435.3619

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Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Manual/Automated Trading Indicator**
Rule References	**Rule 536.B.**
Advisory Date	**September 2, 2020**
Advisory Number	**CME Group RA2010-5**
Effective Date	**September 17, 2020**

Effective on trade date September 17, 2020, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1914-5 from December 17, 2019. It is being issued based on amendments to Rule 536.B. ("Globex Order Entry") in connection with the migration from iLink 2 to iLink 3. Additionally, the FAQ section is being amended to eliminate to references to legacy tags and their associated numbers and replace them with their titles.

No substantive information in this Advisory Notice has been amended.

536.B. Globex Order Entry

1. General Requirement

Each Globex terminal operator entering orders into Globex shall accurately input for each Application Message all fields required to be populated by the CME iLink® Message Specifications set forth in the CME Group Client Systems Wiki in effect at the time, including, but not limited to the: operator ID; price; quantity; product; expiration month; CTI code; manual indicator; and account number (except as provided in Section C), and, for options, put or call and strike price. The Globex Terminal Operator's operator ID must be present on each Application Message, including order messages, submitted to Globex. For a Globex Terminal Operator with access pursuant to Rule 574, the clearing member that guarantees such access to Globex will be responsible for the Globex Terminal Operator's compliance with this rule with respect to the following fields: operator ID, CTI code, manual indicator and account number. Notwithstanding, and in accordance with Rule 574, a clearing member must take appropriate action if it has actual or constructive knowledge that a Globex Terminal Operator has failed to accurately input for each Application Message fields required to be populated by this rule.

With respect to orders received by a Globex Terminal Operator which are capable of being immediately entered into Globex, no record other than that set forth above need be made. However, if a Globex Terminal Operator receives an order which cannot be immediately entered into Globex, the Globex Terminal Operator must prepare a written order and include the account designation, date, time of receipt and other information required pursuant to section A.1. above. The order must be entered into Globex when it becomes executable.

2. Electronic Audit Trail Requirements for Electronic Order Routing/Front-End Systems

Entities certified by the Exchange to connect an order routing/front-end system to the Globex platform through the CME iLink® gateway are responsible for causing an audit trail of each message entered into Globex to be created. Clearing members guaranteeing a connection to Globex are responsible for maintaining or causing to be maintained the electronic audit trail for such systems. This electronic audit trail must be maintained for a minimum of 5 years, and clearing members must have the ability to produce this data in a standard format upon request of Market Regulation.

Each such electronic audit trail must be complete and accurate and account for every electronic communication such system sends to or receives from Globex.

This electronic audit trail must contain all order entry, order modification, and Globex response receipt times to the highest level of precision achievable by the operating system, but at least to the millisecond. The times captured must not be able to be modified by the person entering the order. The data must also contain all required information and fields which include, but not limited to, the following:

a record of all fields relating to order entry, including transaction date, product, Exchange code, expiration month, quantity, order type, order qualifier, price, buy/sell indicator, stop/trigger price, order number, unique transaction number, account number, session ID, operator ID, manual indicator, self-match prevention ID where applicable, host

order number, trader order number, clearing member, type of action, action status code, customer type indicator, origin, and timestamps. For executed orders the audit trail must record the execution time of the trade along with all fill information.

In the case where the guaranteeing Clearing Firm has a direct connect client that is another Clearing Firm or an Equity Member Firm, the Clearing Firm may notify the client Clearing Firm or Equity Member Firm that it is their obligation to maintain the electronic audit trail. Upon execution of this written notice, it shall be the duty of the client Clearing Firm or Equity Member Firm to maintain an electronic audit trail pursuant to this rule. Nothing herein relieves any of the above-referenced firms from compliance with the applicable recordkeeping provisions of CFTC Regulations, including Regulation 1.31 or 1.35.

FAQ Related to the Manual Order Indicator

1. What is the manual order indicator?

The manual order indicator is a data field that is required on all order submissions to CME Globex to indicate whether a particular order is being submitted by manual or automated means. This has been a required data element on CME iLink interface order submissions since June 2011 and is now being added as a regulatory requirement.

2. What specific values must be submitted in the manual order indicator?

The message specifications can be found in the Client System Wiki:
iLink 2 Message Specifications
iLink 3 Message Specifications

3. What is the definition of automated order entry?

Automated order entry refers to orders that are generated and/or routed without human intervention. This includes any order generated by a computer system as well as orders that are routed using functionality that manages order submission through automated means (i.e. execution algorithm).

4. What is the definition of manual order entry?

Manual order entry refers to orders that are submitted to CME Globex by an individual directly entering the order into a front-end system, typically via keyboard, mouse or touch screen, and which is routed in its entirety to the match engine at the time of submission.

5. May an Automated Trading System ("ATS") team operator ID send in both manual and automated orders?

No, ATS teams may send in only automated orders. All manually-entered orders must identify the operator ID of the specific person who entered the order.

6. If an individual who is trading manually also uses automated spreading functionality that automates the entry of some orders, should the orders be designated as manual or automated?

The manually entered orders must be properly identified as manual and the orders generated by automated means, including via automated spreading functionality, must be properly identified as automated as described in the Client Systems Wiki.

7. **If a person manually enters an order into their front-end system which employs functionality that manages the submission of the order(s) to the CME Globex match engine, should the order(s) be designated as manual or automated?**

   The orders should be designated as automated because the execution algorithm is generating the entry of the orders to the CME Globex match engine.

8. **Does the front-end audit trail of the system used to enter orders into CME Globex need to record the manual order indicator values submitted for each order?**

   Yes. The information in manual order indicator required to be captured and accurately recorded in the front-end audit trail.

9. **What is a clearing firm's responsibility with regard to manual order indicator?**

   Clearing firms are expected to ensure that they communicate this requirement to their customer authorized users, and to verify with the client that the manual order indicator is being correctly populated.

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

Betsy Schneider, Manager, Data Investigations, at 312.341.3343

Andrew Carr, Manager, Data Investigations, at 312.435.3610

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Accurate Submission of Customer Type Indicator (CTI) Codes**
Rule References	**Rule 536.D.**
Advisory Date	**August 30, 2021**
Advisory Number	**CME Group RA2111-5**
Effective Date	**October 1, 2021**

Effective on trade date Friday, October 1, 2021, and pending all relevant CFTC regulatory review periods, this Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1616-5 from December 12, 2016. It is being issued based on amendments to CBOT Rule 536.D. ("Customer Type Indicator (CTI) Codes") that become effective on October 1, 2021, in connection with the September 30, 2021, closure of the trading floor for all products other than options on CME Eurodollar futures and options on CME SOFR futures.[1]

Carrying firms must ensure that all give-up trades accepted by the firm contain the correct CTI code by the end of the trading day. In circumstances where an executing firm knows or is apprised of account ownership at order receipt time, the executing firm is also expected to submit the correct CTI code on the original execution record. In a give-up scenario wherein the executing firm does not know the account ownership of a trade intended to be given up to another firm, the executing firm should submit a CTI code 4 on the execution record. In this circumstance, the carrying firm must ensure that the correct CTI code appears on the trade by the end of the trading day.

For give-up trades where the execution information is submitted to the Exchange by a party other than the executing firm, such party is expected to submit the correct CTI code on the original execution record where such party knows or is apprised of account ownership at the time the trade is being submitted. If the party does not know the account ownership of a trade intended to be given up, then the party should submit a CTI code 4 on the execution record. In this circumstance, the carrying firm must ensure that the correct CTI code appears on the trade by the end of the trading day.

Firm Regulatory Portal

Clearing member firms are able to access CTI Code Reports within the Firm Regulatory Portal. Clearing member firms have the ability to generate daily and monthly summary reports, and account level detailed reports, regarding the submission of inaccurate CTI codes for pit, electronic, ex-pit and "give-in received" transactions submitted by that clearing firm.

The Firm Regulatory Portal can be accessed using a CME Group Login. To register for a Login, please visit https://login.cmegroup.com/sso/register/. For further instruction please contact CME Group Login Support at EASE.AtYourService@cmegroup.com or 312.456.1560.

To request Firm Regulatory Portal access, please send an email with your CME Group Login ID to MarketRegFRP@cmegroup.com.

Detailed instructions concerning navigating and generating CTI Code reports are included in a manual that can be accessed under the 'Help' menu once logged in to the Firm Regulatory Portal.

[1] Please see Special Executive Report S-8833 from August 27, 2021, for additional information on the rule amendments.

The text of each Exchange's Rule 536.D. is set forth below.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Terrence Quinn, Manager, Data Investigations, 312.435.3753

Jeffrey Nierman, Lead Data Investigator, 312.341.3195

Andrew Carr, Manager, Data Investigations, 312.435.3610

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

CME

536.D. Customer Type Indicator (CTI) Codes

Each clearing member must identify each transaction 1) executed on the trading floor, 2) executed on the Globex platform or 3) privately negotiated as a block trade pursuant to Rule 526 or an EFRP pursuant to Rule 538 on the record of the transaction submitted to the Exchange with the correct customer type indicator (CTI) code. The CTI codes are as follows:

CTI 1: Electronic Trading, Open Outcry and Privately Negotiated – Applies to transactions initiated and executed by an individual member for their own account, for an account they control, or for an account in which they have an ownership or financial interest. However, transactions initiated and executed by a member for the proprietary account of a member firm must be designated as CTI 2 transactions.

CTI 2: Electronic Trading, Open Outcry and Privately Negotiated – Applies to orders entered or trades executed for the proprietary accounts of a member firm, including Rule 106.H., I., N., R. and S. firms.

CTI 3: Electronic Trading – Applies to orders entered by a member or a nonmember terminal operator for the account of another individual member or an account controlled by such other individual member.

CTI 3: Open Outcry and Privately Negotiated – Applies to orders that a member executes on behalf of another individual member, or for an account such other member controls or in which such other member has an ownership or financial interest.

CTI 4: Electronic Trading, Open Outcry and Privately Negotiated – Applies to all orders and transactions not included in CTI categories 1, 2 or 3. These typically are orders entered by or on behalf of nonmember entities.

CBOT

536.D. Customer Type Indicator (CTI) Codes

Each clearing member must identify each transaction 1) executed on the Globex platform or 2) privately negotiated as a block trade pursuant to Rule 526 or an EFRP pursuant to Rule 538 on the record of the transaction submitted to the Exchange with the correct customer type indicator (CTI) code. The CTI codes are as follows:

CTI 1: Electronic Trading and Privately Negotiated – Applies to transactions initiated and executed by an individual member for their own account, for an account they control, or for an account in which they have an ownership or financial interest. However, transactions initiated and executed by a member for the proprietary account of a member firm must be designated as CTI 2 transactions.

CTI 2: Electronic Trading and Privately Negotiated – Applies to orders entered or trades executed for the proprietary accounts of a member firm, including Rule 106.H., I., J., R. and S. firms.

CTI 3: Electronic Trading – Applies to orders entered by a member or a nonmember terminal operator for the account of another individual member or an account controlled by such other individual member.

CTI 3: Privately Negotiated – Applies to orders that a member executes on behalf of another individual member, or for an account such other member controls or in which such other member has an ownership or financial interest.

CTI 4: Electronic Trading and Privately Negotiated – Applies to all orders and transactions not included in CTI categories 1, 2 or 3. These typically are orders entered by or on behalf of nonmember entities.

NYMEX/COMEX

536.D. Customer Type Indicator (CTI) Codes

Each clearing member must identify each transaction 1) executed on the Globex platform or 2) privately negotiated as a block trade pursuant to Rule 526 or an EFRP pursuant to Rule 538 on the record of the transaction submitted to the Exchange with the correct customer type indicator (CTI) code. The CTI codes are as follows:

CTI 1: Electronic Trading and Privately Negotiated – Applies to transactions initiated and executed by an individual member for their own account, for an account they control, or for an account in which they have an ownership or financial interest. However, transactions initiated and executed by a member for the proprietary account of a member firm must be designated as CTI 2 transactions.

CTI 2: Electronic Trading and Privately Negotiated – Applies to orders entered or trades executed for the proprietary accounts of a member firm.

CTI 3: Electronic Trading – Applies to orders entered by a member or a nonmember terminal operator for the account of another individual member or an account controlled by such other individual member.

CTI 3: Privately Negotiated – Applies to orders that a member executes on behalf of another individual member, or for an account such other member controls or in which such other member has an ownership or financial interest.

CTI 4: Electronic Trading and Privately Negotiated – Applies to all orders and transactions not included in CTI categories 1, 2 or 3. These typically are orders entered by or on behalf of nonmember entities.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Exchange for Related Positions**
Rule References	**Rule 538**
Advisory Date	**August 15, 2025**
Advisory Number	**CME Group RA2503-5**
Effective Date	**August 29, 2025**

Effective on trade date August 29, 2025, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2306-5 from December 7, 2023. It is being issued to codify existing guidance for Immediately Offsetting Foreign Currency EFPs ("IOFXEFP") in Q&A 29 and Q&A 30, and to renumerate guidance previously codified in Q&A 27 and Q&A 28. No substantive information in Q&A 27 and Q&A 28 of this Advisory Notice has been amended. No other material changes have been made to the Advisory Notice.

Market participants should note that no changes have been made with respect to the continued prohibition on the execution of transitory EFRPs in any products. The execution of transitory EFRPs, which prior to August 4, 2014, had been permitted in CME foreign currency products, NYMEX energy products and COMEX and NYMEX metals products remain strictly prohibited.

As defined in Rule 538, transitory EFRPs are EFRPs in which the execution of an EFRP is contingent upon the execution of another EFRP or related position transaction between the parties and where the transactions result in the offset of the related positions without the incurrence of market risk that is material in the context of the related position transactions. Questions 14-17 in the FAQ provide additional guidance in this regard.

The time-period between the transactions is a factor considered in assessing whether the EFRP is a transitory EFRP; however, the legitimacy of the transactions will be evaluated based on whether the transactions have integrity as independent transactions exposed to market risk that is material in the context of the transactions.

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

For NYMEX and COMEX Products
Mei Ling Toh, Director, 212.299.2241
Tom Dixon, Senior Director, 212.299.2901

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For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

Text of Rule 538 – ("Exchange for Related Positions")

An Exchange for Related Position ("EFRP") transaction involves a privately negotiated off-exchange execution of an Exchange futures or options contract and, on the opposite side of the market, the simultaneous execution of an equivalent quantity of the cash product, by-product, related product, or OTC derivative instrument corresponding to the asset underlying the Exchange contract.

The following types of EFRP transactions are permitted to be executed outside of the Exchange's centralized market in accordance with the requirements of this rule:

> Exchange of Futures for Physical ("EFP") – the simultaneous execution of an Exchange futures contract and a corresponding physical transaction or a forward contract on a physical transaction.
>
> Exchange of Futures for Risk ("EFR") – the simultaneous execution of an Exchange futures contract and a corresponding OTC swap or other OTC derivative transaction.
>
> Exchange of Option for Option ("EOO") – the simultaneous execution of an Exchange option contract and a corresponding transaction in an OTC option.

For purposes of this rule, EFPs, EFRs and EOOs shall collectively be referred to as EFRP transactions.

538.A. Parties to an EFRP

One party to the EFRP must be the buyer of the Exchange contract and the seller of (or the holder of the short market exposure associated with) the related position; the other party to the EFRP must be the seller of the Exchange contract and the buyer of (or the holder of the long market exposure associated with) the related position. The Exchange contract and the corresponding related position must be executed for accounts with the same beneficial ownership.

A third party may facilitate, as principal, the related position component of an EFRP on behalf of a customer. Except for immediately offsetting foreign currency EFPs executed pursuant to Section K., such third party must be able to demonstrate that the related position was passed through to the customer who received the Exchange contract as part of the EFRP.

Specifically with respect to the execution of immediately offsetting foreign currency EFPs pursuant to Section K. by CTAs, account controllers, or other Persons acting on behalf of another party, the initiating and offsetting cash legs are not required to be passed through to the customer who received the Exchange contract as part of the EFRP. However, in a circumstance where the futures leg of the transaction fails to clear, the underlying customer must receive the profit or loss, if any, attendant to the offset of the offsetting cash leg.

Parties to an EFR or EOO transaction must comply with all relevant CFTC regulations governing eligibility to participate in the related position component of such transactions.

538.B. Independently Controlled Accounts

The opposing accounts to an EFRP transaction must be (a) independently controlled accounts with different beneficial ownership; (b) independently controlled accounts of separate legal entities with common beneficial ownership; or (c) independently controlled accounts of the same legal entity, provided that the account controllers operate in separate business units.

For EFRP transactions between accounts with common beneficial ownership, the parties to the trade must be able to demonstrate the independent control of the accounts and that the transaction had economic substance for each party to the trade.

538.C. Related Position

The related position component of an EFRP must be the cash commodity underlying the Exchange contract or a by-product, a related product or an OTC derivative instrument of such commodity that has a reasonable degree of price correlation to the commodity underlying the Exchange contract. The related position component of an EFRP may not be a futures contract or an option on a futures contract.

Each EFRP requires a bona fide transfer of ownership of the underlying asset between the parties or a bona fide, legally binding contract between the parties consistent with relevant market conventions for the particular related position transaction.

The execution of an EFRP transaction may not be contingent upon the execution of another EFRP or related position transaction between the parties where the transactions result in the offset of the related position without the incurrence of market risk that is material in the context of the related position transactions.

The facilitation of the execution of an EFRP by any party that knows such EFRP is non bona fide shall constitute a violation of this Rule.

538.D. EFPs in Connection with Inventory Financing of Storable, Non-Financial Commodities

A party providing inventory financing for a storable agricultural, energy or metals commodity may, through the execution of an EFP, purchase the commodity and sell the equivalent quantity of futures contracts to a counterparty, and grant to the counterparty the non-transferable right, but not the obligation, to execute a second EFP during a specified time period in the future which will have the effect of reversing the original EFP.

538.E. Quantity Equivalence

The quantity of the related position component of the EFRP must be approximately equivalent to the quantity of the Exchange component of the EFRP. Appropriate hedge ratios between the Exchange and related position components of the EFRP may be used to establish equivalency.

538.F. Prices and Price Increments

The Exchange component of the EFRP transaction must be priced in accordance with the applicable futures price increments or option premium increments as set forth in the rules governing the Exchange contract.

EFRPs may be transacted at such commercially reasonable prices as are mutually agreed upon by the parties to the transaction. EFRPs may not be priced to facilitate the transfer of funds between parties for any purpose other than as the consequence of legitimate commercial activity.

538.G. EFRPs Following the Termination of Trading in Exchange Contracts

EFRP transactions in certain Exchange contracts may be executed for a defined period of time following the termination of trading in accordance with the applicable product rules governing each Exchange contract. Such transactions may be executed only to liquidate Exchange positions.

538.H. Recordkeeping

Parties to an EFRP transaction must maintain all records relevant to the Exchange contract and the related position transaction, including order tickets, records customarily generated in accordance with relevant market practices, records reflecting payments between the parties and, where appropriate, transfer of title, as well as any other records required to be kept pursuant to CFTC Regulation 1.35. Brokers who facilitate EFRP transactions must maintain all records corresponding to their facilitation of the transactions.

Records related to EFRP transactions must be provided to the Exchange upon request. It shall be the responsibility of the carrying clearing member firm to obtain and submit the requested records of their clients to the Exchange on a timely basis.

538.I. Submission to the Clearing House

Each EFRP transaction shall be submitted to the Clearing House within the time period and in the manner specified by the Exchange and the Clearing House. In all cases, the record submitted to the Clearing House must reflect the correct EFRP transaction type and must reflect the accurate date and time at which the relevant terms of the transaction were agreed upon by the parties to the trade.

An EFRP transaction submitted to the Clearing House shall not be considered accepted by the Clearing House until the transaction has cleared and the first payment of settlement variation and performance bond has been confirmed.

538.J. EFRP Volumes Required to be Reported with Daily Large Trader Positions

Each clearing member, omnibus account and foreign broker responsible for submitting daily large trader positions in accordance with Rule 561 must submit for each reportable account the EFRP volume bought and sold in the reportable instrument. This information must be included in the daily Large Trader report to the Exchange.

538.K. Immediately Offsetting EFPs in Foreign Currency Futures

EFPs in foreign currency futures wherein the parties immediately offset the cash transaction are permitted and the Exchange would expect to see confirmation statements issued by the bank/foreign exchange dealer party to the Transaction. These confirmation statements should be the type normally produced by the bank/foreign exchange dealer for confirmation of currency deals and should indicate, by name, the identity of the counter party principal to the Transaction. However, in circumstances where the EFP Transaction is between a bank/foreign exchange dealer and a CTA, account controller, or other Person acting on behalf of a third party (such as a commodity pool or fund), the cash side confirmation statement must identify, at minimum, the name of the third party's Carrying Clearing Member and the third party's account number (or other account specific designation), but need not identify the third party by name. These transactions are only permissible as EFPs in foreign currency futures and not in any other asset class or in EFRs or EOOs in foreign currency futures.

FAQ Related to Rule 538
Exchange for Related Positions

Q1: What are EFRP transactions?

A1: EFRP is an acronym for Exchange for Related Position, and EFRPs are one of the permitted exceptions to the requirement that futures and options on futures be executed openly and competitively on the Exchange.

An EFRP transaction involves the off-exchange execution of an Exchange futures or options on futures contract and, on the opposite side of the market, the simultaneous execution of an equivalent quantity of the cash product, by-product, related product or OTC derivative instrument corresponding to the asset underlying the Exchange contract.

Q2: What is the difference between EFRP transactions and "Ex-Pit" transactions?

A2: The term "Ex-Pit Transaction" refers broadly to transactions that Exchange rules permit to be executed outside of the Exchange's centralized market. Permissible Ex-Pit transactions include EFRPs, block trades and transfer trades. EFRPs are addressed in Rule 538; block trades are addressed in Rule 526, and transfer trades are addressed in Rule 853.

Q3: What are the different types of EFRPs permitted by the CME Group Exchanges?

A3: The following types of Exchange for Related Position ("EFRP") transactions are permitted to be executed outside of the Exchange's centralized market in accordance with the requirements of Rule 538, the application guidance in this advisory, and any applicable CFTC regulations.

Exchange of Futures for Physical ("EFP") – the simultaneous execution of an Exchange futures contract and a corresponding physical transaction or a forward contract on a physical transaction.

Exchange of Futures for Risk ("EFR") – the simultaneous execution of an Exchange futures contract and a corresponding OTC swap transaction or other OTC derivative transaction.

Exchange of Option for Option ("EOO") – the simultaneous execution of an Exchange option contract and a corresponding transaction in an OTC option. No other instrument other than an OTC option is eligible as the related position component of an EOO.

The related position component of an EFRP may not be a futures contract or an option on a futures contract.

Where the related position component of an EFRP is a physical transaction, a forward contract that is not otherwise defined as a swap under federal regulations, an Exchange Traded Fund ("ETF") or an Exchange Traded Note ("ETN"), the transaction should be submitted for clearing as an EFP transaction type.

Where the related position component of an EFRP is an instrument defined as a swap pursuant to federal regulations, or is another OTC derivative transaction, the transaction must be submitted as an EFR or an EOO transaction type, as applicable, and must be reported as required under Parts 43 and 45 of Commodity Futures Trading Commission Regulations. For further information regarding CFTC/SEC product definitions, market participants should reference the August 13, 2012 Federal Register release (77 FR 48207) that defines swaps and the scope of the forward contract exclusion.

A swap that is traded on, or subject to the rules of, a designated contract market ("DCM") or a swap execution facility ("SEF") is ineligible to be the related position component of an EFR or EOO transaction executed pursuant to Rule 538.

The above-referenced exclusion does not apply to swaps that are bilaterally negotiated and submitted for clearing-only to a DCO provided such swaps have a reasonable degree of correlation to the underlying CME Group Exchange product.

Q4: May EFRPs be executed in any of the CME Group Exchanges' futures and options contracts?

A4: EFRPs may be executed in any of the CME Group Exchanges' futures and futures options contracts provided the transaction conforms to the requirements of Rule 538 and any associated advisories, as well as with any applicable CFTC regulations.

Notwithstanding the foregoing, CBOT Soybean Crush Spread Options are not able to be submitted to CME Clearing through CME ClearPort or CME Direct and are therefore ineligible to be executed as EFRPs.

Q5: May EFRPs be transacted on electronic systems?

A5: It is not permissible to facilitate the execution of EFRPs on a system or facility accessible to multiple parties that allows for the electronic matching of or the electronic acceptance of bids and offers. Parties may use communication technologies to bilaterally request EFRP quotes from one or more participants and to conduct privately negotiated EFRPs. Parties may also utilize technologies supported by third parties which allow for the electronic posting of indicative EFRP markets displayed to multiple market participants. However, EFRPs executed between parties based on such electronically displayed indicative markets may be transacted only through direct bilateral communications involving the broker, where applicable, and the parties to the trade.

Q6: Are there specified trading hours during which EFRP transactions may be executed?

A6: EFRPs may be executed at any time. However, an EFRP transaction submitted to the Clearing House shall not be considered to have been accepted by the Clearing House until the transaction has cleared and the first payment of settlement variation and performance bond has been confirmed.

Q7: May an EFRP be executed after trading has ceased in an expiring contract?

A7: EFRP transactions in certain Exchange contracts may be executed for a defined period of time following the termination of trading only to liquidate Exchange positions and only in accordance with the applicable product rules governing each Exchange contract. The applicable product chapter of the relevant Exchange's rulebook will specify if such transactions are permitted and, if so, the time period following the cessation of trading during which such transactions are eligible to be executed.

Q8: Are there restrictions on who may participate in EFRP transactions?

A8: EFP Transactions – There are no specific eligibility requirements for participation in an EFP transaction.

EFR and EOO Transactions – Participants to EFR and EOO transactions must comply with applicable CFTC requirements governing eligibility to transact the related position component of an EFR or EOO, and participants should consult with counsel as appropriate to determine eligibility. In this regard, market participants should be mindful of all eligibility standards applicable to related positions, including, where applicable, CFTC Regulations Part 32-Regulation of Commodity Option Transactions and Part 35-Swaps in an Agricultural Commodity.

Q9: May EFRPs be executed between affiliated accounts?

A9: The opposing accounts involved in the execution of an EFRP must be:

a) independently controlled accounts with different beneficial ownership; or
b) independently controlled accounts of separate legal entities with common beneficial ownership; or
c) independently controlled accounts of the same legal entity provided that the account controllers operate in separate business units.

Accounts with the same beneficial ownership include accounts owned by the same person or entity, accounts of a parent and its wholly owned subsidiaries, and accounts of subsidiaries that are wholly owned by the same parent. Common beneficial ownership is more inclusive and includes not only accounts with the same beneficial ownership, but also accounts with common beneficial ownership that is less than 100%.

Parties to an EFRP transaction involving the same legal entity or common beneficial owner must be able to demonstrate the independent control of decision making for the respective accounts and that the EFRP had economic substance for each party to the trade.

Q10: Are multi-party EFRP transactions permitted?

A10: Typically, there may be only two parties involved in an EFRP transaction. One party to the EFRP must be the buyer of the Exchange contract and the seller of (or the holder of the short market exposure associated with) the related position; the other party to the EFRP must be the seller of the Exchange contract and the buyer of (or the holder of the long market exposure associated with) the related position. The Exchange contract and corresponding related position of an EFRP must be executed for accounts with the same beneficial ownership.

Any third party may facilitate, as principal, the related position component of an EFRP on behalf of a customer provided that the third party can demonstrate that the related position was passed through to the customer who received the Exchange contract as part of the EFRP.

With respect to the execution of Immediately Offsetting Foreign Currency EFPs ("IOFXEFP") pursuant to Rule 538.K. by CTAs, account controllers, or other Persons acting on behalf of another party, the initiating and offsetting cash legs are not required to be passed through to the customer who received the Exchange contract as part of the EFRP. However, in a circumstance where the futures leg of the transaction fails to clear, the underlying customer must receive the profit or loss, if any, attendant to the offset of the offsetting cash leg.

Q11: Are there restrictions on the price at which an EFRP transaction may be executed?

A11: EFRPs may be transacted at such commercially reasonable prices as are mutually agreed upon by the parties to the transaction, provided that the price conforms to the applicable futures price increments or option premium increments set forth in the product chapter rules for the relevant Exchange contract.

The futures leg of EFP and EFR transactions in those commodities and contract months permitted to be priced at the settlement or marker price or any permissible price increment above or below the settlement or marker price pursuant to the provisions of Rule 524 will be eligible for TAS, TAM, or TMAC pricing. Please note that the futures leg of spot month Copper EFPs and EFRs may be priced solely at the settlement price, or TAS flat.

Please see the Table set forth in the Interpretations & Special Notices Section at the end of Chapter 5 of each Exchange's Rulebook for information on the specific products, contract months and permissible price increments for TAS, TAM or TMAC transactions, which may also be accessed here.

EFRPs executed at off-market prices are more likely to be reviewed by Market Regulation to determine the purpose for the pricing. EFRPs may not be priced off-market for the purpose of shifting substantial sums of cash from one party to another, to allocate gains and losses between the futures or options on futures and the cash or OTC derivative components of the EFRP, to evade taxes, to circumvent financial controls by disguising a firm's financial condition, or to accomplish some other unlawful purpose.

Q12: May EFRPs be average priced?

A12: Yes. EFRP transactions designated for average pricing must conform to the requirements of Rule 553 ("Average Price System") and Rule 538.

Q13: Are the prices and quantities of EFRP transactions publicly reported?

A13: The price of the Exchange leg of an EFRP transaction is not publicly reported. EFRP volumes are reported daily, by instrument, on the CME Group website.

Parties to an EFR or EOO transaction should consult CFTC regulations regarding the swap reporting requirements associated with their execution of the related position transaction.

Q14: Are transitory EFRPs permitted in any products listed on CME Group exchanges?

A14: No.

Transitory EFRPs are EFRPs in which the execution of an EFRP is contingent upon the execution of another EFRP or related position transaction between the parties and where the transactions result in the offset of the related positions without the incurrence of market risk that is material in the context of the related position transactions.

The time period between the transactions is a factor considered in assessing whether the EFRP is a transitory EFRP; however, the legitimacy of the transactions will be evaluated based on whether the transactions have integrity as independent transactions exposed to market risk that is material in the context of the transactions.

Where economically equivalent futures products trade on a CME Group Exchange and another exchange, the contingent execution between two parties of equal and opposite EFRPs on each exchange where the related position components offset and are not subject to market risk shall be considered a prohibited transitory EFRP at the applicable CME Group Exchange.

Q15: May a swap be negotiated to settle via an EFR?

A15: Parties to a swap may agree to settle the swap via an EFR provided that the determination of the settlement value of the swap (floating price) is subject to market risk that is material in the context of the transaction. For example, parties may negotiate a swap to settle via EFR on a specific date in the future at the futures settlement price or the average settlement price over a prescribed time period.

Q16: Can an EFRP incorporate multiple legs on the Exchange component of the transaction or incorporate multiple legs on the related position component of the EFRP?

A16: An EFRP may incorporate multiple Exchange components provided that the EFRP is not a prohibited transitory EFRP as defined in Section C. and in the answer to Question 14 of this Advisory Notice. Accordingly, an EFRP with multiple Exchange components where the related position components offset without the incurrence of market risk that is material in the context of the related position transactions would not be permissible. Alternatively, an EFRP with multiple Exchange components where the related position components do not offset and where those related position components incur material market risk are permitted.

An EFRP may incorporate multiple related position components provided that the net exposure of the related position components is approximately equivalent to the quantity of futures exchanged or, in the case of an EOO, the net delta-adjusted quantity of the OTC option components is approximately equivalent to the delta-adjusted quantity of the Exchange-listed option.

Q17: May EFPs be utilized to facilitate inventory financing in storable non-financial commodities?

A17: EFP transactions entered into for the purpose of obtaining inventory financing for storable agricultural, metals and energy commodities are permitted in accordance with the following: A party providing inventory financing for a storable, non-financial commodity may, through the execution of an EFP, purchase the commodity and sell the equivalent quantity of futures contracts to a counterparty, while simultaneously granting to the counterparty the non-

transferable right, but not the obligation, to execute a second EFP that reverses the original EFP during a specified time period in the future.

Q18: What types of instruments are considered acceptable for use as the related position side of EFRPs?

A18: The related position component of the EFRP must involve the product underlying the Exchange contract or a by-product, related product or OTC derivative instrument that is reasonably correlated to the corresponding Exchange instrument.

The related position component of an EFRP may not be a futures contract or an option on a futures contract.

Where the risk characteristics and/or maturities of the related position differ from the instrument underlying the Exchange contract, the parties to the EFRP may be required to demonstrate the correlation between the products and the methodology used in equating the futures to the related position. In all cases, the related position transaction must be comparable with respect to quantity, value or risk exposure of the corresponding Exchange contract.

Each EFRP requires a bona fide transfer of ownership of the cash commodity between the parties or a bona fide, legally binding contract between the parties consistent with relevant market conventions for the particular related position transaction.

Where the related position component of an EFRP is a physical transaction, a forward contract that is not otherwise defined as a swap under federal regulations, an Exchange Traded Fund ("ETF") or an Exchange Traded Note ("ETN"), the transaction should be submitted for clearing as an EFP transaction type.

Where the related position component of an EFRP is an instrument defined as a swap pursuant to federal regulations, or is another OTC derivative transaction, the transaction must be submitted as an EFR or an EOO transaction type, as applicable, and must be reported as required under Parts 43 and 45 of Commodity Futures Trading Commission Regulations. For further information regarding CFTC/SEC product definitions, market participants should reference the August 13, 2012 Federal Register release (77 FR 48207) that defines swaps and the scope of the forward contact exclusion.

Generally acceptable related position instruments for EFRPs in the following product groups include, but are not limited to, the following:

Foreign Exchange Contracts: Instruments acceptable as the related position component of an FX EFRP transaction include spot, forwards, non-deliverable forwards ("NDFs"), swaps and swaptions, cross-currency basis swaps, OTC FX options, non-deliverable options ("NDOs"), currency baskets, ETFs and ETNs.

Interest Rate Contracts: Instruments acceptable as the related position component of an interest rate EFRP include Treasuries, Agencies, investment grade corporates, money market instruments, interest rate swaps and swaptions, forward rate agreements (FRAs), mortgage instruments including collateralized mortgage obligations, OTC interest rate options, ETFs and ETNs.

Equity Index Contracts: Instruments acceptable as the related position component of a stock index EFRP include stock baskets provided the basket is highly correlated to the index and, further, that the basket represents at least 50% of the underlying index by weight or includes at least 50% of the

stocks in the underlying index. The notional value of the basket must be approximately equal to the value of the corresponding exchange contract. Other acceptable instruments include equity index swaps and swaptions, OTC equity index options, ETFs and ETNs.

Agricultural Contracts: Instruments acceptable as the related position component of an EFRP in agricultural products include the commodity underlying the futures contract or a by-product or related product that is reasonably correlated to the futures being exchanged, physical forwards, cash-settled forwards, agricultural commodity swaps or swaptions, OTC agricultural options, ETFs and ETNs.

Commodity Index Contracts: Instruments acceptable as the related position component of an EFRP involving an Exchange contract based on a commodity index (*e.g.*, S&P GSCI, Bloomberg Commodity Index) include a corresponding commodity index swap or swaption, ETFs or ETNs.

Energy Contracts: Instruments acceptable as the related position component of an EFRP in energy products include the commodity underlying the futures contract or a by-product or related product that is reasonably correlated to the futures being exchanged, physical forwards, cash-settled forwards, energy commodity swaps or swaptions, OTC energy options, ETFs and ETNs.

Metals Contracts: Instruments acceptable as the related position component of an EFRP in metals products include related spot transactions, physical forwards, cash-settled forwards, swaps and swaptions, OTC metals options, ETFs and ETNs.

Questions regarding the acceptability of related position instruments may be addressed to the Market Regulation contacts listed in this Advisory Notice.

Q19: What are the recordkeeping requirements for EFRPs?

A19: Parties to an EFRP must maintain all records relevant to the Exchange contract and the corresponding related position transaction, including any records required to be kept pursuant to CFTC Regulation 1.35. Upon request, such records must be provided to Market Regulation in a timely manner.

Records that may be requested include, but are not limited to, the following:

A. All order tickets, trade blotters, e-mails, instant messages, telephone recordings or other records related to the order placement, negotiation, execution and/or confirmation of the EFRP.

B. All cash confirmations and signed contracts corresponding to the cash or derivative component of the EFRP. The documentation must contain all of the relevant terms of the transaction and counterparty information.

C. For EFPs, third party proof of payment evidencing settlement and documentation representing the transfer of ownership of the commodity. For EFPs involving forward contracts, such information may be requested if the forward contract has settled at the time of the request. For EFRs and EOOs, where applicable, proof of payment evidencing settlement between the parties.

D. Futures account statement reflecting confirmation of the EFRP.

E. Records reflecting the booking of the cash or derivative transaction in the firm's internal bookkeeping systems.

Parties who facilitate EFRP transactions must maintain all records corresponding to their facilitation of the transactions.

Q20: Who is responsible for submitting EFRP records when a request for such records is made by the Market Regulation Department?

A20: Upon request, related position documentation for an EFRP must be provided on a timely basis and in the form and manner requested, to the Market Regulation Department. The clearing firm carrying the account shall be responsible for obtaining relevant EFRP records from its client and submitting the records to Market Regulation.

Pursuant to Rule 418 ("Consent to Exchange Jurisdiction"), any party initiating or executing a transaction subject to the rules of the Exchange, or for whose benefit such transaction has been executed, is subject to the jurisdiction of the Exchange and may be required by Market Regulation to produce records and cooperate fully with any investigation.

Failures to provide requested records in a complete or timely manner may result in the issuance of charges pursuant to the provisions of Rule 406 ("Issuance of Charges").

Q21: Must transactions executed as EFRPs be designated as EFRPs on account statements or other records of the transaction?

A21: Yes. Account statements and other records of the transaction made pursuant to the requirements of Rule 536 and CFTC Regulation 1.38 must accurately identify EFRP transactions as such. It is not acceptable to designate the trades as "Ex-Pit" or "ClearPort" trades as such terms may reflect transaction types other than EFRPs.

Q22: How are EFRPs submitted to the Clearing House?

A22: EFRPs must be submitted via CME Direct or CME ClearPort.

Information on the various methods of registration for access to CME Direct or CME ClearPort may be via the following links:

http://www.cmegroup.com/trading/cme-direct/registration.html#newFirmUserRegistration

http://www.cmegroup.com/clearport/registration.html

EFRPs in CME and CBOT Products

EFRPs may be entered in CME Direct or CME ClearPort from 5:00 p.m. CT Sunday through 5:45 p.m. CT Friday. CME Direct and CME ClearPort do not permit the entry of CME and CBOT EFRPs during the maintenance window, from 5:45 p.m. CT and 6:00 p.m. CT Monday through Thursday.

EFRPs in NYMEX and COMEX Products

EFRPs may be entered in CME Direct or CME ClearPort from 5:00 p.m. CT/6:00 p.m. Eastern Time ("ET") through 4:00 p.m. CT/5:00 p.m. ET each business day. CME Direct and CME ClearPort do not permit the entry of NYMEX and COMEX EFRPs between 4:00

p.m. CT/5:00 p.m. ET and 5:00 p.m. CT/6:00 p.m. ET each business day and at all times on weekends.

EFRPs may also be reported to the CME ClearPort Facilitation Desk/Global Command Center via email at FacDesk@cmegroup.com. **Please note that for the Facilitation Desk to submit the trade, the counterparty accounts must be registered with credit limits and product permissions set up in CME Account Manager.**

The Facilitation Desk is closed from 4:30 p.m. CT/5:30 p.m. ET Friday through 5:00 p.m. CT/6:00 p.m. ET Sunday.

Please contact the Enterprise Application & Systems Entitlements (EASE) Team with any additional registration questions in the U.S. at +1 312 456 1560, in Europe at +44 20 3379 3802 or in Asia at +65 6593 5536.

If you have any trade submission issues, please contact the CME ClearPort Facilitation Desk/Global Command Center in the U.S. at +1 800 438 8616, in Europe at +44 20 7623 4747 or in Asia at +65 6532 5010.

Q23: How soon after execution must the EFRP be submitted to the Clearing House?

A23: Absent mitigating circumstances, EFRP transactions must be submitted to the Exchange as soon as possible, but no later than the end of the business day on which the EFRP was executed.

The relevant terms of the EFRP are considered to have been determined at the time the price and quantity of the Exchange contract and the corresponding related position component of the transaction are agreed upon by the parties to the EFRP. For EFPs and EFRs eligible to be priced as TAS, TAM, or TMAC transactions, the execution time of the trade is considered to have been determined at the time the quantity and price (TAS-, TAM-, or TMAC-flat or any permissible price increment above or below the settlement or marker price) have been agreed upon by the parties to the EFP or EFR.

However, where the actual delivery quantity may not be precisely determined by the parties until the time of delivery, the parties may contractually agree to submit the transaction to the Clearing House within the required reporting period following the time at which the actual delivery quantities are determined, rather than reporting the EFRP at the time of pricing. Absent such contractual arrangement, the transaction must be reported at the time of pricing.

Notwithstanding the foregoing, EFRPs may not, under any circumstances, be submitted for clearing later than the end of the permissible posting period for EFRP transactions following the expiration of the underlying futures contract as specified in the relevant product chapter of the applicable Exchange rulebook.

Q24: Must the execution date and time be submitted for EFRPs?

A24: The date and time of execution must be accurately submitted for each EFRP transaction. The execution date and time to be submitted are the date and time at which the relevant terms of the transaction were determined by the parties to the trade as described in Q22.

The execution time for EFRPs must be entered in CME Direct or CME ClearPort in the local time of the party(ies) entering the EFRP.

Q25: What information regarding EFRPs must be submitted in a reporting firm's daily Large Trader position file?

A25: A firm's daily Large Trader position file must include for each reportable account the EFRP volume bought and sold in the reportable instrument.

Q26: What are the responsibilities of firms in connection with EFRPs executed or cleared on behalf of a customer?

A26: Firms that execute or clear EFRPs on behalf of customers are responsible for ensuring that their customers who execute EFRPs are fully informed regarding Exchange EFRP requirements. Upon request by the Market Regulation Department, firms carrying accounts that execute EFRPs are responsible for obtaining and submitting records of their clients' EFRP transactions in a timely and complete manner.

If a clearing member has actual or constructive notice or knowledge of the execution of non-bona fide EFRPs by its customer and the clearing member fails to take appropriate action, the clearing member will be found to have violated Rule 538.C.

Q27: May a second EFP be transacted between two parties to an initial EFP to adjust for a circumstance where the actual amount of the physical product delivered as part of the initial EFP is larger or smaller than the quantity represented by the number of futures contracts exchanged in the initial EFP?

A27: Yes. Two parties that execute and submit an initial EFP at the time of pricing (see FAQ 23) and later find that the amount of physical product delivered is larger or smaller than the quantity represented by the number of futures exchanged in that EFP may transact a second EFP (typically referred to as a "true-up EFP") to account for the difference once the actual delivery quantities are determined. Absent mitigating circumstances, true-up EFP transactions must be submitted to the Exchange as soon as possible, but no later than the end of the business day on which the actual delivery quantities are confirmed by the parties.
Notwithstanding the foregoing, upon mutual agreement, the parties may instead choose to financially settle the quantity difference as opposed to posting a true-up EFP.

Q28: Is an Immediately Offsetting EFP in Foreign Currency Futures ("IOFXEFP") prohibited as a transitory EFRP in Foreign Currency Futures?

A28: No. An IOFXEFP as expressly permitted under Rule 538.K. is not prohibited as a transitory EFRP because the offsetting cash transaction is not contingent on the EFP in any way. If, for example, the futures leg of an immediately offsetting EFP in foreign currency is not accepted for clearing, the EFP transaction is void ab initio and the counterparties would be left with the stand-alone cash transaction. Nevertheless, Rule 538.K. makes clear that the stand-alone cash and EFP transactions may occur immediately and result in the offset of the cash transactions without being prohibited as a transitory EFRP.

Q29: In a permitted IOFXEFP transaction pursuant to Rule 538.K., are the offsetting cash transactions required to be booked directly in the counterparties' accounts?

A29: No, in a permitted IOFXEFP the immediately offsetting cash transactions are not required to be booked in the counterparties' accounts. However, if the futures leg of the related EFP is not accepted for clearing, the EFP is void ab initio and the counterparties will be left with the stand-alone cash transaction.

Q30: What additional documentation is required to be maintained and produced in connection with IOFXEFP transactions?

A30: The parties must prepare and maintain documentation that shows the private negotiation of the IOFXEFP transaction, which shall include evidence of the immediately offset cash transaction and the related EFP. A statement or written summary of the IOFXEFP (e.g., PDF, e-mail, Bloomberg VCON, electronic audit trail) which reflects each component of the transaction, inclusive of the cash transaction and related EFP, will suffice. As noted in Q&A 29, the cash components of the IOFXEFP may not be required to be booked in the underlying accounts. Therefore, there may not be a standard "long form" confirmation that parties may typically use for stand-alone OTC FX trades.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Pre-Execution Communications**
Rule References	**Rule 539**
Advisory Date	**April 8, 2024**
Advisory Number	**CME Group RA2401-5**
Effective Date	**April 22, 2024**

Effective on trade date April 22, 2024, and pending all relevant CFTC regulatory review periods, this revised Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2112-5R from October 1, 2021. It is being issued in connection with the revision of CME, CBOT, NYMEX/COMEX Rule 539.C. ("Pre-Execution Communications Regarding Globex Trades") to remove Agency Cross ("A-Cross") as an available crossing protocol.

The text of each Exchange's Rule 539 appears at the end of this Advisory Notice.

No other substantive changes have been made to this Advisory Notice.

A complete list of eligible products and associated crossing protocols may be found here:

http://www.cmegroup.com/rulebook/files/rule-539-c-crossing-protocols.xlsx

1. General Overview of Pre-Execution Communications

Pre-execution communications are defined as communications between market participants for the purpose of discerning interest in the execution of a transaction prior to the exposure of the order to the market. Any communication that involves discussion of the size, side of market or price of an order, or a potentially forthcoming order, constitutes a pre-execution communication.

Pre-execution communications are prohibited in connection with options on SOFR futures transactions executed via open outcry on the trading floor.

Pre-execution communications are permitted in all CME, CBOT, NYMEX and COMEX futures and options products and CBOT invoice swap spreads traded on Globex.

2. General Requirements for Permissible Pre-Execution Communications on Globex

Pre-execution communications may occur only when the party for whose benefit the trade is being executed has previously consented to such communications.

Parties who have been involved in an allowable pre-execution communication may not disclose the details of that communication to other parties, nor may a party place any order to take advantage of the information conveyed in such communications except to facilitate the trade in accordance with the rule. All transactions arising from permitted pre-execution communications must be executed in accordance with the requirements set forth in Rule 539.C.

3. Pre-Execution Communications Crossing Protocols on Globex

The permissible protocol(s) for a particular product are set forth in the **Table**.

Market participants must ensure that the entry of orders into Globex which result from permissible pre-execution communications utilize a permitted cross protocol for the particular product. In many instances, more than one cross protocol may be available for a particular group of products.

The use of an ineligible cross protocol for a particular product or group of products constitutes a violation of Rule 539.C.

A description of the three cross protocols is set forth below:

A. Globex Cross ("G-Cross")

In a G-Cross, the order of the party that initiated the pre-execution must be entered into Globex first. The second party's order may not be entered into Globex until a period of 5 seconds has elapsed from the time of entry of the first order. No Request for Quote ("RFQ") is required in a G-Cross.

The G-Cross protocol is available for all futures and swaps products for which pre-execution communications are permissible. The G Cross protocol may not be used for the entry of any options orders or any spreads or combinations that include an option.

B. Committed Cross ("C-Cross")

In a C-Cross, subsequent to the pre-execution communication, a Request for Cross ("RFC") order which contains both the buy and the sell orders must be entered into Globex. Upon entry of the RFC, Globex will display an indication that a cross has been committed to the market and will occur in five (5) seconds.

Parties to a C-Cross may begin to hedge the risk associated with the pending cross by entering a risk-mitigating order as soon as they have agreed to the cross, subject to the following limitations. Hedging is prohibited in the same product and expiration month, and, for a put or call option, the same strike price as the agreed upon C-Cross. Further, an intermediary taking the opposite side of a customer order in a C-Cross transaction is prohibited from beginning to hedge that transaction until the C-Cross has been executed.

Market participants are reminded that it is a violation of Exchange rules for a person to place any order to take advantage of the details of a forthcoming C-Cross transaction where the participant is acting on material nonpublic information regarding an impending transaction by another person, or is acting on nonpublic information obtained through a confidential employee/employer relationship, broker/customer relationship, or in breach of a pre-existing duty. The Exchange may proceed with an enforcement action when the facts and circumstances of hedging a forthcoming C-Cross suggest deceptive or manipulative conduct by any of the involved parties, including when an intermediary handling a customer order violates its agency duties owed to the customer.

Market participants are further reminded that the C-Cross functionality will interact with the orders in the order book based on the C-Cross algorithm for the product as described below. Parties who engage in permissible hedging of a C-Cross have the potential to be left with an unhedged position after the cross is executed.

The matching algorithm for the C-Cross will depend on whether the group of products is eligible for a better price or volume match ("BPVM"). See the Table for information on products eligible for a BPVM allocation and the specific match percentage applicable to those products.

1. Matching Algorithm for C-Cross with BPVM:

If the price of the RFC represents a new best price level (both a bid price higher than the current bid and an offer price lower than the current offer) or the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer at the time of submission of the RFC to Globex, **and**, during the five (5) second period between the entry of the RFC and the cross occurring, a better price for either the buy or sell order has not been entered into Globex, a certain percentage of the quantity ("BPVM allocation") on the RFC will cross at the RFC price. After the initial BPVM allocation, the remainder of the RFC will match as set forth in #2 below.

Where the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer, the quantity eligible for the BPVM is the difference between the RFC quantity and the quantity at that current best bid or offer.
If the event the RFC price does not meet the requirements set forth above, the entirety of the cross will match as set forth in #2 below.

2. Matching Algorithm for C-Cross without BPVM:

   If the RFC price improves both the best bid and best offer (or if there is no bid/offer) in the order book after the five (5) seconds following submission of the RFC, 100% of the RFC quantity will match at the RFC price.

   If the RFC price matches or is outside the best bid or offer in the market after the five (5) seconds following submission of the RFC, the applicable side of the RFC order will match against the orders in the book at a price better than or equal to the RFC price. Immediately thereafter, 100% of the smaller quantity remaining on one side of the RFC will match against the order on the opposite side of the RFC at the RFC price. Any unmatched balance on one side of the RFC will remain in the order book unless it is cancelled by the user.

C-Cross functionality is supported on CME Direct, and may be supported by other Independent Software Vendors ("ISVs").

C. RFQ + RFC Cross ("R-Cross")

In an R-Cross, subsequent to the pre-execution communication, an RFQ for the particular option or spread or combination involving an option must be entered into Globex. Thereafter, the RFC order must be entered no less than fifteen (15) seconds and no more than thirty (30) seconds after the entry of the RFQ in order to proceed with the trade. In CME Dairy futures and options, the RFC order must be entered no less than five (5) seconds and no more than thirty (30) seconds after the entry of the RFQ in order to proceed with the trade. The RFQ and the RFC order must be entered within the same trading session. Failure to enter the RFC order within 30 seconds after the entry of the RFQ will require a new RFQ to be entered prior to the entry of the RFC order, which must be entered in accordance with the time parameters described above in order to proceed with the trade.

Neither the price nor the quantity of the orders on the RFC is displayed to the marketplace. Additionally, there is no information on the participant-entered RFQ which identifies that an RFC is forthcoming. A participant-entered RFQ in connection with an R-Cross is indistinguishable from a generic RFQ sent to Globex.

Numerous ISVs support the R-Cross. For market participants using CME Direct, functionality built into the application will prevent the entry of the RFC outside of the prescribed time requirements. This functionality is intended to facilitate compliance with the relevant entry time requirements.

The matching algorithm for R-Cross is as follows:

1. If the RFC price improves both the best bid and best offer in the order book or if there is no bid/offer in the order book, 100% of the RFC quantity will match at the RFC price immediately upon submission of the RFC.

2. If the RFC price matches or is outside the best bid or offer in the market, the applicable side of the RFC order will immediately match against the orders in the book at a price better than or equal to the RFC price. Immediately thereafter, 100% of the smaller quantity remaining on one side of the RFC will match against the order on the opposite side of the RFC at the RFC price. Any unmatched balance on one side of the RFC will remain in the order book unless it is cancelled by the user.

Additional information on the crossing protocols is available via the following link:

https://www.cmegroup.com/confluence/display/EPICSANDBOX/Cross+on+CME+Globex

4. Rule 539.C. Crossing Protocols Table

A complete list of eligible products and associated crossing protocols may be found here:

http://www.cmegroup.com/rulebook/files/Rule-539-C-Crossing-Protocols.xlsx

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Erin Middleton, Senior Director, Rules & Regulatory Outreach, 312.341.3286

Jennifer Dendrinos, Senior Director, Investigations, 312.341.7812

Natasha Selkov, Manager, Investigations, 312.341.7623

Kathryn Guerra, Investigations Specialist, Investigations, 312.341.3028

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

CME

539. PREARRANGED, PRE-NEGOTIATED AND NONCOMPETITIVE TRADES PROHIBITED

539.A. General Prohibition

No person shall prearrange or pre-negotiate any purchase or sale or noncompetitively execute any transaction, except in accordance with Sections B. and C. below.

539.B. Exceptions

The foregoing restriction shall not apply to block trades pursuant to Rule 526 or Exchange for Related Positions transactions pursuant to Rule 538.

539.C. Pre-Execution Communications Regarding Globex Trades

Parties may engage in pre-execution communications with regard to transactions executed on the Globex platform where one party (the first party) wishes to be assured that a contra party (the second party) will take the opposite side of the order under the following circumstances:

1. A party may not engage in pre-execution communications with other market participants on behalf of another party unless the party for whose benefit the trade is being made has previously consented to permit such communications.
2. Parties to pre-execution communications shall not (i) disclose to a non-party the details of such communications or (ii) enter an order to take advantage of information conveyed during such communications except in accordance with this rule.
3. Permissible Entry Methods for Orders

   The following order entry methods for futures, options, spreads and combinations vary by product, as set forth in the Rule 539.C. Crossing Protocols Table ("Table") in the Interpretations Section at the end of Chapter 5.

   a. Globex Cross ("G-Cross")

The first party's order is entered into the Globex platform first. The second party's order may not be entered into the Globex platform until a period of 5 seconds has elapsed from the time of entry of the first order.

b. Committed Cross ("C-Cross")

Following the pre-execution communication, a Request for Cross ("RFC") order which contains both the buy and the sell orders must be entered into the Globex platform. Upon entry of the RFC, the Globex platform will display an indication that a cross will occur in five (5) seconds. In certain products as set forth in the Table in the Interpretations Section at the end of Chapter 5, a certain percentage of the quantity on the RFC will cross if the price of the RFC represents a new best price level or if the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer at the time of submission of the RFC to the Globex platform, and a better price for either the buy or sell order has not been entered into the Globex platform during the five (5) second period between entry of the RFC and the cross occurring.

c. RFQ + RFC Cross ("R-Cross")

Following the pre-execution communication, a Request for Quote ("RFQ") for the particular futures, options spread or combination must be entered into Globex. Thereafter, the RFC order must be entered no less than fifteen (15) seconds and no more than thirty (30) seconds after the entry of the RFQ in order to proceed with the trade, except the RFC order in Dairy futures and options must be entered no less than five (5) seconds and no more than thirty (30) seconds after the entry of the RFQ. The RFQ and the RFC order must be entered within the same trading session. Failure to enter the RFC order within 30 seconds after the entry of the RFQ will require a new RFQ to be entered prior to the entry of the RFC order, which must be entered in accordance with the time parameters described above in order to proceed with the trade.

CBOT

539. PREARRANGED, PRE-NEGOTIATED AND NONCOMPETITIVE TRADES PROHIBITED

539.A. General Prohibition

No person shall prearrange or pre-negotiate any purchase or sale or noncompetitively execute any transaction, except in accordance with Sections B. and C. below.

539.B. Exceptions

The foregoing restrictions shall not apply to block trades pursuant to Rule 526 or Exchange for Related Positions transactions pursuant to Rule 538.

539.C. Pre-Execution Communications Regarding Globex Trades

Parties may engage in pre-execution communications with regard to transactions executed on the Globex platform where one party (the first party) wishes to be assured that a contra party (the second party) will take the opposite side of the order under the following circumstances:

1. A party may not engage in pre-execution communications with other market participants on behalf of another party unless the party for whose benefit the trade is being made has previously consented to permit such communications.
2. Parties to pre-execution communications shall not (i) disclose to a non-party the details of such communications or (ii) enter an order to take advantage of information conveyed during such communications except in accordance with this rule.
3. Permissible Entry Methods for Orders

   The following order entry methods for futures, options, swaps, spreads and combinations vary by product, as set forth in the Rule 539.C. Crossing Protocols Table ("Table") in the Interpretations Section at the end of Chapter 5.

   a. Globex Cross ("G-Cross")

   The first party's order is entered into the Globex platform first. The second party's order may not be entered into the Globex platform until a period of 5 seconds has elapsed from the time of entry of the first order.

   b. Committed Cross ("C-Cross")

   Following the pre-execution communication, a Request for Cross ("RFC") order which contains both the buy and the sell orders must be entered into the Globex platform. Upon entry of the RFC, the Globex platform will display an indication that a cross will occur in five (5) seconds. In certain products as set forth in the Table in the Interpretations Section at the end of Chapter 5, a certain percentage of the quantity on the RFC will cross if the price of the RFC represents a new best price level or if the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer at the time of

submission of the RFC to the Globex platform, and a better price for either the buy or sell order has not been entered into the Globex platform during the five (5) second period between entry of the RFC and the cross occurring.

c. RFQ + RFC Cross ("R-Cross")

Following the pre-execution communication, a Request for Quote ("RFQ") for the particular futures, options spread or combination must be entered into Globex. Thereafter, the RFC order must be entered no less than fifteen (15) and no more than thirty (30) seconds after the RFQ in order to proceed with the trade. The RFQ and the RFC order must be entered within the same trading session. Failure to enter the RFC order within 30 seconds after the entry of the RFQ will require a new RFQ to be entered prior to the entry of the RFC order, which must be entered in accordance with the time parameters described above in order to proceed with the trade.

NYMEX/COMEX

539. PREARRANGED, PRE-NEGOTIATED AND NONCOMPETITIVE TRADES PROHIBITED

539.A. General Prohibition

No person shall prearrange or pre-negotiate any purchase or sale or noncompetitively execute any transaction, except in accordance with Sections B. and C. below.

539.B. Exceptions

The foregoing restriction shall not apply to block trades pursuant to Rule 526 or Exchange for Related Positions transactions pursuant to Rule 538.

539.C. Pre-Execution Communications Regarding Globex Trades

Parties may engage in pre-execution communications with regard to transactions executed on the Globex platform where one party (the first party) wishes to be assured that a contra party (the second party) will take the opposite side of the order under the following circumstances:

1. A party may not engage in pre-execution communications with other market participants on behalf of another party unless the party for whose benefit the trade is being made has previously consented to permit such communications.
2. Parties to pre-execution communications shall not (i) disclose to a non-party the details of such communications or (ii) enter an order to take advantage of information conveyed during such communications except in accordance with this rule.
3. Permissible Entry Methods for Orders

   The following order entry methods for futures, options, spreads and combinations vary by product, as set forth in the Rule 539.C. Crossing Protocols Table ("Table") in the Interpretations Section at the end of Chapter 5.

   a. Globex Cross ("G-Cross")

   The first party's order is entered into the Globex platform first. The second party's order may not be entered into the Globex platform until a period of 5 seconds has elapsed from the time of entry of the first order.

   b. Committed Cross ("C-Cross")

   Following the pre-execution communication, a Request for Cross ("RFC") order which contains both the buy and the sell orders must be entered into the Globex platform. Upon entry of the RFC, the Globex platform will display an indication that a cross will occur in five (5) seconds. In certain products as set forth in the Table in the Interpretations Section at the end of Chapter 5, a certain percentage of the quantity on the RFC will cross if the price of the RFC represents a new best price level or if the price of the RFC is equal to the best bid or offer and the quantity of the RFC is greater than the quantity at that current best bid or offer at the time of submission of the RFC to the Globex platform, and a better price for either the buy or sell order has not been entered into the Globex platform during the five (5) second period between entry of the RFC and the cross occurring.

   c. RFQ + RFC Cross ("R-Cross")

   Following the pre-execution communication, a Request for Quote ("RFQ") for the particular option or option spread or combination must be entered into Globex. Thereafter, the RFC order must be entered no less than fifteen (15) seconds and no more than thirty (30) seconds after the entry of the RFQ in order to proceed with the trade. The RFQ and the RFC order must be entered within the same trading session. Failure to enter the RFC order within 30 seconds after the entry of the RFQ will require a new RFQ to be entered prior to the entry of the RFC order, which must be entered in accordance with the time parameters described above in order to proceed with the trade.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Daily Submission of Large Trader, Ownership/Control Reports, and Open Interest Data**
Rule References	**Rule 561**
Advisory Date	**September 28, 2020**
Advisory Number	**CME Group RA2014-5**

This Advisory Notice supersedes Market Regulation Advisory Notice RA1713-5 from September 26, 2017, and is being issued as a result of the extension of the CFTC's Division of Market Oversight's No-Action relief set forth in CFTC Letter 20-30 issued on September 25, 2020.

Under the extension, the volume threshold for reporting volume threshold accounts on CFTC Form 102B will remain at 250 contracts until the earlier of: (a) the applicable effective date or compliance date of a CFTC action addressing the reporting volume threshold or (b) September 29, 2023.

This Advisory Notice continues to reflect changes to Rule 561 in connection with the CFTC Ownership and Control Reports ("OCR") rule. As noted in Market Surveillance Notice # MSN11-04-14 ("MSN11-04-14") from November 4, 2014, CME, CBOT, NYMEX and COMEX ("the Exchanges") require submission of new CFTC Forms 102A and 102B in line with the CFTC OCR rule and require that the new forms be submitted to the Exchanges in the same form and manner as required by the CFTC's OCR rule. The Exchanges accept submissions of new CFTC Forms 102A and 102B in XML formatted files (as specified in the CFTC OCR rule), or manual submissions of the new CFTC Forms 102A and 102B through the enhanced Firm Regulatory Portal ("FRP"). The XML formatted files can be submitted with the following filename:

PFTP_OCR_XCME_[FIRMID]_[YYMMDD]_[HHMMSS].xml or
PFTP_OCR_XCME_[FIRMID]_[YYMMDD]_[HHMMSS]_[UNIQUIFIER].xml

The text of CME/CBOT/NYMEX/COMEX Rule 561 appears at the end of this Advisory Notice.

CFTC Form 102A Submission

Reporting parties are required to provide the Market Regulation Department ("Market Regulation") with an electronic submission of CFTC Form 102A ("Identification of Special Accounts") which accurately identifies the owners, controllers, controlled accounts and any additional information required on the form for each account that becomes reportable for the first time.

Complete CFTC Form 102A information must be provided within three (3) business days of the first date the account becomes reportable. However, Market Regulation requires preliminary account information including *Special Account Origination, Reporting Number and Name and House or Customer Indicator* within one (1) business day of the first date the account becomes reportable.

Market Regulation requires an updated report for accounts with material changes that cause the information previously submitted to be inaccurate. The updated reports are required to be submitted within three (3) business days of such changes becoming effective. A material change includes change of account name, address, owners, controllers, or controlled accounts. Notwithstanding the above, Market Regulation may also request an update on an as-needed basis for any account as it deems necessary.

Where notification has been provided to the CFTC that an account has been deemed expired/closed, Market Regulation must be provided a similar notification.

CFTC Form 102B Submission

Clearing members are required to provide a new CFTC Form 102B for any trade account that meets the volume threshold of 250 contracts or more in a single trading day.

Complete CFTC Form 102B information must be provided within three (3) business days of the first date the account becomes reportable under the revised rule. However, Market Regulation requires preliminary account information such as, *Trading Account Data for the Volume Threshold Account, Associated Special Account Number and Volume Threshold Account Owner(s)* within one (1) business day of the first date the account becomes reportable.

Market Regulation requires an updated report for accounts with material change that causes the information previously submitted to be inaccurate. The updated reports are required to be submitted within three business days of such changes becoming effective. A material change includes change of account name, address, owners, controllers, or controlled accounts. Notwithstanding the above, Market Regulation may also request an update on an as-needed basis for any account as it deems necessary.

Where notification has been provided to the CFTC that an account has been deemed expired/closed, Market Regulation must be provided similar notification.

CME Group Firm Regulatory Portal

The CME Group Firm Regulatory Portal ("FRP") provides various reports and screens to assist in accurate and timely account and position reporting.

The FRP has been enhanced to allow reporting clearing firms the capability to generate a large trader and open interest comparison report ("Misreporting Report") by product, contract month and, for options, by strike price. The Misreporting Report also allows clearing member firms to query reported positions and to utilize static queries to assist in identifying additional potential reporting discrepancies such as potential offsets and over- or under-reporting of positions. Market Regulation strongly encourages firms to utilize this functionality to assist in the identification of potential reporting discrepancies in order to ensure that any necessary adjustments are submitted by the established adjustment deadlines.

The FRP has been recently enhanced to assist clearing firms and omnibus accounts in OCR reporting. An Unidentified Special Accounts Reports allows reporting firms to identify CFTC Forms 102A and 102B accounts for which Market Regulation does not have any account information. The FRP portal also contains screens that will allow reporting firms to manually enter account information for CFTC Forms 102A and 102B accounts.

The FRP can be accessed at https://fltr.cmegroup.com/firmregulatoryportal/logon.jsp using a registered CME Group Login and requesting access to MarketRegLTRAlerts@cmegroup.com. Registration instructions for obtaining a CME Group Login may be found at FRP homepage. For technical issues please email MarketRegLTRAlerts@cmegroup.com.

A manual is available on the FRP.

Omnibus Account Reporting

Omnibus accounts that carry reportable positions pursuant to Rule 561 must submit reportable large trader positions directly to the Market Regulation Department via Secure FTP ("SFTP") to the CME Group File Server. Omnibus reporting entities may submit large trader positions using the CFTC-assigned alpha firm ID. If an omnibus entity does not currently submit large trader positions and is not set up to submit via SFTP, the entity should contact the Market Regulation Department Large Trader Group to obtain

further reporting instructions. The omnibus entity may use the following large trader file layout: http://www.cftc.gov/IndustryOversight/MarketSurveillance/LargeTraderReportingProgram/ltrformat.html

In order to ensure accurate open interest and large trader positions, clearing members are required to obtain timely offset instructions for all accounts they carry, including omnibus accounts. Clearing members are responsible for the accurate position reporting of accounts carried on their books on an omnibus basis. Accordingly, clearing members must have appropriate procedures in place to ensure the that any position offsets for omnibus accounts are reported in a timely manner, no later than the established adjustment deadlines set forth below.

CFTC Form 40 Submission

Market Regulation may require submission of CFTC Form 40 in any instances it deems necessary.

Accurate and Timely Reporting Requirements

All clearing firms and omnibus accounts are reminded that it is their responsibility to accurately report open interest, large trader positions and, where applicable, long positions eligible for delivery consistent with required submission deadlines. This requirement includes ensuring that open interest and large trader positions resulting from option assignments are accurate.

Open Interest (PCS) Submission:	6:00 p.m. CT / 7:00 p.m. ET for NYMEX and COMEX products 7:30 p.m. CT / 8:30 p.m. ET for CME and CBOT products
Open Interest (PCS) Adjustments:	The deadline for PCS adjustments for all CME Group Exchanges is 8:15 a.m. CT / 9:15 a.m. ET
Large Trader Submission:	7:00 a.m. CT / 8:00 a.m. ET for all CME Group products
Large Trader Adjustments:	9:00 a.m. CT/10:00 a.m. ET for all CME Group products. Error corrections or any other adjustments to the large trader position file may be completed using the web-based Firm Regulatory Portal ("FRP") portal application.

Positions at or above the reportable level in a particular expiration month of a futures contract, in all puts or in all calls of a particular option contract expiration month, or an Exchange-listed swap contract are required to be reported. For an account with reportable positions in a particular contract, all positions, regardless of size, in any contract month and in any contract that aggregates with that contract must be reported. The Position Limit, Position Accountability and Reportable Level Table at the end of Chapter 5 of each Exchange's Rulebook establishes the aggregation relationship. If an account is reportable in any contract, all "Aggregate Into" contracts noted in the spot-month, single month and all month aggregate into futures equivalent leg (1) and leg (2) columns of the Position Limit, Position Accountability and Reportable Level Table at the end of Chapter 5 of each Exchange's Rulebook should be reported.

Failure to comply with any of the above reporting requirements may result in sanctions pursuant to CME, CBOT, NYMEX and COMEX Rule 512.

Questions regarding this Advisory should be directed to the following Market Regulation Staff:

Lou Abarcar, Data Investigations Architect, 312.341.3236 or Lou.Abarcar@cmegroup.com

Danyelle Franks, Lead Data Investigator, 312.341.7646, or Danyelle.Franks@cmegroup.com

Erin Middleton, Senior Director, Rules and Regulatory Outreach, 312.341.3286, or Erin.Middleton@cmegroup.com

Trenton Crawford, Senior Specialist, Rules & Regulatory Outreach, 312.307.9006, or
Trenton.Crawford@cmegroup.com

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

CME/CBOT/NYMEX/COMEX
Rule 561. SUBMISSION OF LARGE TRADER POSITIONS AND VOLUME THRESHOLD ACCOUNTS

561.A. Large Trader Reporting

Clearing members, omnibus accounts and foreign brokers shall electronically submit to the Exchange a daily large trader position report of all positions required to be reported as set forth in the Position Limit, Position Accountability and Reportable Level Table, in the Interpretations Section at the end of Chapter 5.

Positions at or above the reportable level in a particular expiration month of a futures contract, in all puts or in all calls of a particular option contract expiration month, or an Exchange-listed swap contract are required to be reported. For an account with reportable positions in a particular contract, all positions, regardless of size, in any contract month and in any contract that aggregates with that contract must be reported.

The daily large trader position report submitted to the Exchange must also include, for each reportable account, 1) the EFRP volume bought and sold in the reportable instrument, by contract month, and for EOOs by put and call strike and 2) the number of delivery notices issued and the number of deliveries stopped in the reportable instrument.

In addition to the large trader position report, clearing members, omnibus accounts and foreign brokers must electronically provide the Exchange with a CFTC Form 102A ("Identification of Special Accounts") accurately identifying the owners, controllers, controlled accounts and any additional information required for each reportable account within three business days of the first day that the account in question becomes a reportable account. Notwithstanding the three business day submission requirement, on the first day that an account becomes reportable, clearing members, omnibus accounts and foreign brokers must, at the direction of the Exchange, provide the following information: account type, reportable account number and names and addresses of the owners and controllers of the account.

The Exchange may require that more than one large trader position report be electronically submitted daily. The Business Conduct Committee or the Market Regulation Department may require reports or additional account identification from any clearing member, omnibus account or foreign broker on a lesser number of positions than reflected in the Position Limit, Position Accountability and Reportable Level Table.

If any material change causes the information previously submitted to the Exchange to become inaccurate, then such clearing member, omnibus account or foreign broker must electronically submit to the Exchange an updated form reflecting the accurate information within three business days of such changes becoming effective. Additionally, in the absence of any material changes, the Exchange may require the electronic submission of a new form on an annual basis for the maintenance of accurate records. A material change includes, but is not limited to, change of account name, address, controllers or controlled accounts.

561.B. Volume Threshold Reporting

A volume threshold account is any account that meets the volume threshold of contracts traded in a single trading day as defined in CFTC Regulation 15.04. Clearing members, shall electronically submit to the Exchange a CFTC Form 102B ("Identification of Volume Threshold Accounts") accurately identifying account information for volume threshold accounts, including the owners, controllers, controlled accounts and any additional information required by the report within three business days of the first day that the account in question becomes a volume threshold account. Notwithstanding the three business day submission requirement, on the first day that an account becomes reportable, clearing members, omnibus accounts and foreign brokers must, at the direction of the Exchange, provide the following information: account type, reportable account number and names and addresses of the owners and controllers of the account.

If any material change causes the information previously submitted to the Exchange to be inaccurate, then such clearing member, omnibus account or foreign broker must electronically submit to the Exchange an updated form reflecting the accurate information within three business days of such changes becoming effective. Additionally, in the absence of any material changes, the Exchange may require the submission of a new form on an annual basis for the maintenance of accurate records. A material change includes, but is not limited to, change of account name, address, controllers or controlled accounts.

561.C. Obligations of Omnibus Accounts and Foreign Brokers

Failure by an omnibus account or foreign broker to submit required information may result in a hearing by the Business Conduct Committee and result in limitations, conditions or denial of access of such omnibus account or foreign broker to any Exchange market. Notwithstanding the above, clearing members carrying such accounts remain responsible

for obtaining and providing to the Exchange information regarding the ownership and control of positions in circumstances where an omnibus account or foreign broker has failed to provide the information to the Exchange. Clearing firms must require their clients to provide accurate and timely owner and control information, including any material changes.

Upon request from the Exchange, clearing members, omnibus accounts and foreign brokers must provide CFTC Form 40.

561.D. Reportable Levels

The large trader reportable levels for all contracts are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations Section at the end of Chapter 5.

Any trading account with a trading volume of 50 or more contracts during a single trading day, in a particular expiration month of a futures contract or in all puts or in all calls of a particular options contract expiration month is a reportable volume threshold account.

[Notwithstanding the foregoing, please see CFTC No-Action Letter 17-45 issued on September 25, 2017.]

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Revised List of Products Subject to Large Trader Reporting of Physical Commodity Swaps under CFTC Part 20 Regulations**
Rule References	**Rule 561**
Advisory Date	**December 6, 2021**
Advisory Number	**CME Group RA2118-5**

This Market Regulation Advisory Notice contains an updated list of products subject to large trader reporting requirements under the CFTC's Part 20 Regulations (Large Trader Reporting for Physical Commodity Swaps). This notice supersedes Market Regulation Advisory Notice RA1507-5 from June 2, 2015.

Clearing Code	Product Name	Product Chapter in Relevant Rulebook
SES	S&P GSCI ER Index Swaps	CME Chapter 415A
RRE	S&P GSCI Enhanced ER Index Swaps	CME Chapter 415B
DGS	Bloomberg Commodity Index Swaps*	CBOT Chapter 29A

* Formerly called DJ UBS

Questions regarding this Advisory Notice may be directed to Sandra Valtierra, Manager, Market Regulation, at 312.347.4137.

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Position Limits and Accountability Levels**
Rule References	**Rules 559, 560, and 562**
Advisory Date	**July 29, 2025**
Advisory Number	**CME Group RA2502-5**
Effective Date	**August 12, 2025**

Effective on trade date August 12, 2025, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory will supersede CME Group Market Regulation Advisory Notice RA2205-5 from October 7, 2022. It is being issued in connection with CFTC Letter No. 25-21 No-Action, dated July 18, 2025, extending no-action relief from certain aggregation requirements except in a situation where such person holds or controls the trading of such positions in order to willfully circumvent applicable position limits. It is also being issued to remove guidance previously codified in Q&A 11 of CME Group Market Regulation Advisory Notice RA2205-5, which is no longer applicable, and subsequently renumerate the FAQ section.

The amendments to this Advisory Notice are reflected in the answers to Q&A 8 and Q&A 9, as well as Q&As 11 through 15. No substantive information in Q&As 11 through 15 of this Advisory Notice has been amended.

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

For NYMEX and COMEX Products	For CME and CBOT Products
Tom Dixon, Sr. Director, 212.299.2901	Nicole Pecyna, Director, 312.341.7713
Chris Reinhardt, Exec. Director, 312.435.3665	Brian Babinski, Director, 312.341.5822
	William Lange, Director, 312.341.7757
	Chris Reinhardt, Exec. Director, 312.435.3665

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

FAQ Related to Position Limits, Position Accountability and Reportable Levels

Q1: What is the difference between Position Limits, Accountability and Reportable Levels?

A1: **Position Limits** are levels which a market participant may **not** exceed unless they have an approved exemption. Any positions in excess of these limits would be considered a rule violation pursuant to Rule 562.

Position Limits are calculated on a net futures-equivalent basis by contract and include contracts that aggregate into one or more base contracts as set forth in the Table.

Position Accountability Levels are levels which a market participant may exceed and not be in violation of an Exchange Rule. A market participant who exceeds an accountability (or reportable) level may be asked by the Market Regulation Department (the "Department") to

provide information relating to the position, including, but not limited to, the nature and size of the position, the trading strategy employed with respect to the position, and hedging information, if applicable. Failure to supply the requested information may result in an order to reduce such positions, in addition to disciplinary action as a result of the failure.

Additionally, any market participant who has a position in excess of an accountability level is deemed to have consented, when so ordered by the Department to:

- not further increase the positions;
- comply with any limit on the size of the position; and/or
- reduce any open position which exceeds a position accountability level.

Generally, these actions would be taken only after having been contacted by the Department regarding the open positions.

The Department calculates positions using three separate methods for purposes of its position accountability reviews. Any position that exceeds an accountability level based on any of the three methods is considered by the Department to be in excess of the accountability level. The three methods are as follows:

1. Spot Month/Single Month/All Month Accountability Levels are calculated on a net futures-equivalent basis by contract and include contracts that aggregate into one or more base contracts as set forth in the Table.

2. Spot Month/Single Month/All Month Accountability Levels are calculated on a net futures-only basis.

3. Spot Month/Single Month/All Month Accountability Levels for options are calculated per option quadrant (long call, long put, short call, short put) on a gross basis.

Reportable Levels are levels at which clearing members, omnibus accounts and foreign brokers are required to submit to the Exchange a daily report of all positions as set forth in the Table. Positions at or above the reportable level in a particular expiration month of a futures contract, or in all puts or in all calls of a particular option contract expiration month, trigger the reportable status. A person who is reportable in a particular product must report **all open positions** in all futures and in all open puts or calls on such futures in the product and in any product that aggregates into the product, **regardless of size**.

Market participants should be aware that not all products have position limits or position accountability levels. Position limits, position accountability levels and reportable levels are listed in each Exchange's Table and may be accessed via the following link:
http://www.cmegroup.com/market-regulation/position-limits.html

Q2: What is the difference between Spot Month, Second Spot Month, Single Month and All Month for purposes of position limits and position accountability levels, and when do they go into effect?

A2: **Spot Month** generally goes into effect as a particular contract month becomes the closest contract month to expiration or as a contract nears expiration. The dates vary by contract and market participants should reference the Table to identify when the spot month limits go into effect. For example, NYMEX RBOB Gasoline futures has a spot month limit of 2,000 net futures-equivalent contracts that becomes effective at the close of trading three business days prior to the last trading day of the contract month.

Subsequent Spot Month limits are lower than spot month limits and go into effect after the initial spot month limit, as the contract month nears expiration. For example, in CME Live Cattle futures the spot month limit is reduced from 600 net futures-equivalent contracts effective at the close of trading on the first business day following the first Friday of the contract month to 300 net futures-equivalent contracts effective at the close of trading on the business day immediately preceding the last 5 trading days of the contract month. Additionally, the limit changes from 300 to 200 at the close of trading on the business day prior to the last 2 trading days of the contract month.

Single Month is defined as the position held in any given contract month outside of the spot period effective date. For example, a CBOT December 2023 Corn futures contract has a single month limit of 57,800 net futures-equivalent contracts prior to the spot month effective date.

All Month is defined as the net open position held across all contract months of a particular product and is effective at all times. For example, the CME S&P 500 Stock Price Index futures all month limit is 60,000 net futures-equivalent contracts. If a market participant is long 32,000 September 2021 contracts, long 30,000 December 2021 contracts and short 1,000 March 2021 contracts, the all month position is long 61,000 net futures-equivalent contracts. They would be over the all month limit by 1,000 contracts.

The Department publishes a monthly notice of spot month effective dates for core products. The notice is posted on the CME Group website and is also available via an email subscription.

Website: Select Category – Market Regulation & Market Surveillance Notices

In order to receive the notice via email, you will need to create a CME Group login and go to the Subscription Center page. Once there, select Market Regulation Advisories – Market Surveillance Notices.

Q3: Are there limits for holding delivery instruments?

A3: Yes, for the CBOT products specified below. No person shall own or control more than the below amount of registered and outstanding shipping certificates/warehouse receipts issued by facilities designated by the Exchange as regular to issue shipping certificates unless they have received a hedge exemption from the Exchange. This includes any mini-sized certificates (in futures equivalent contracts). If a person is stopped for delivery in a quantity that would cause such person to exceed the certificate limit, the person must cancel, retender, or sell the quantity of certificates in excess of the limit no later than the close of business on the following business day. Failure to do so constitutes a position limit violation. Please see FAQ 4 for information concerning deliveries in physically-delivered metals contracts.

Corn	1,200	Wheat	1,200
Soybean	1,200	Oat	600
Soybean Oil	1,100	Rough Rice	800
Soybean Meal	1,500	KC Wheat	1,200

Q4: Do deliveries in physically-delivered metals contracts impact the futures position in the spot month for purposes of compliance with spot month position limits?

A4: Effective for the April 2021 contracts and beyond, in physically-delivered metals contracts, the spot month position limit will be applied and enforced separately for futures and for deliveries during the spot month. For example, the Gold futures contract has a spot month position limit of 6,000 contracts and no person may hold more than 6,000 Gold futures contracts (on a net

futures-equivalent basis) during the spot month unless they have received a hedge exemption from the Exchange. Separately, a participant may not make (issue) or take (stop) delivery of more than 6,000 net futures-equivalent contracts during the spot month unless they have received a hedge exemption from the Exchange. If a person stops certificates for delivery in a quantity that would cause such person to exceed the certificate limit, the person must retender the quantity of certificates in excess of the limit no later than the close of business on the following business day. Failure to do so constitutes a position limit violation.
Given that the spot month limit is applied separately for futures and for deliveries, no netting between futures and deliveries is permitted.

Q5: How does aggregation of contracts work?

A5: The aggregation of contracts for single month, all month and spot month are noted in each Table.

Using the spot month as an example, for a contract that aggregates into only one base contract during the spot month, the base contract will be identified in the "Spot Month Aggregate Into Futures Equivalent Leg (1)" column of the Table and will denote a positive correlation with the base contract. The aggregation ratio for the Leg (1) base contract will be identified in the "Aggregate Into Ratio Leg (1)" column of the Table.

For contracts that aggregate into two separate base contracts during the spot month, the base contract noted in the "Spot Month Aggregate Into Futures Equivalent Leg (1)" column of the Table will denote a positive correlation, and the aggregation ratio for the Leg (1) base contract will be identified in the "Aggregate Into Ratio Leg (1)" column of the Table. The base contract noted in the "Spot Month Aggregate Into Futures Equivalent Leg (2)" column of the Table will denote a negative correlation with respect to the base contract, and the aggregation ratio for the Leg (2) base contract will be identified in the "Aggregate Into Ratio Leg (2)" column of the Table**.**

Q6: How are options on futures counted for purposes of position limits?

A6: Options on futures positions are aggregated into the underlying futures contracts in accordance with the Table on a delta equivalent value.

If a position exceeds position limits as a result of an option assignment, the person who owns or controls such position shall be allowed one business day to liquidate the excess position without being considered in violation of the limits. Additionally, if, at the close of trading, a position that includes options exceeds position limits when evaluated using the delta factors as of that day's close of trading, but does not exceed the limits when evaluated using the previous day's delta factors, then the position shall not constitute a position limit violation.

Q7: What does a diminishing balance contract mean and how do you calculate its futures equivalence?

A7: Diminishing balance contracts are specific futures contracts whose front month position in any given contract month diminishes as the contract month progresses towards expiration/month end for purposes of position limits. Typically, a contract diminishes each Exchange business day a portion of the final settlement price is established. The number of Exchange business days varies depending on the calendar month, and in calculating a diminishing balance, market participants should exclude the calendar date of any U.S. holiday as set forth in the CME Globex Holiday Calendar available on the CME Group website.

Diminishing balance contracts are typically those where the final settlement price is equal to the arithmetic average of a determined referenced price for each business day that it is determined during the contract month; or the balance of the month average of a determined referenced price for each business day that it is determined during the contract month, starting from the selected start date through the end of the contract month, inclusive.

Diminishing balance contracts are identified as such in the Table.

An example of a diminishing balance contract and its futures-equivalent value is set forth below.

Example 1: Chicago CBOB Gasoline (Platts) Futures (commodity code "2C")

Customer holds 6,600 October 2015 "2C" contracts going into October 2015 and does not add or liquidate any positions during the month.

	Futures Position	Futures Equivalent Position
Start of Day Position	2C October 2015 Contract	2C October 2015 Contract
10/1/2015	6,600	6,600
10/2/2015	6,600	6,300
10/5/2015	6,600	6,000
10/6/2015	6,600	5,700
10/7/2015	6,600	5,400
10/8/2015	6,600	5,100
10/9/2015	6,600	4,800
10/12/2015	6,600	4,500
10/13/2015	6,600	4,200
10/14/2015	6,600	3,900
10/15/2015	6,600	3,600
10/16/2015	6,600	3,300
10/19/2015	6,600	3,000
10/20/2015	6,600	2,700
10/21/2015	6,600	2,400
10/22/2015	6,600	2,100
10/23/2015	6,600	1,800
10/26/2015	6,600	1,500
10/27/2015	6,600	1,200
10/28/2015	6,600	900
10/29/2015	6,600	600
10/30/2015	6,600	300

Q8: How does aggregation of accounts work with respect to position limits and position accountability levels?

A8: Aggregation of positions is based on ownership or control. All positions in accounts for which any person, by power of attorney or otherwise, directly or indirectly controls trading or holds a 10 percent

or greater ownership or equity interest must be aggregated with the position held and trading done by such person. For the purpose of determining the positions in accounts for which any person controls trading or holds a 10 percent or greater ownership or equity interest, positions or ownership or equity interests held by, and trading done or controlled by, two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by, or the trading were done or controlled by, a single person.

While CFTC Regulation 150.4(a)(2) requires any person that, by power of attorney or otherwise, holds or controls the trading of positions in more than one account or pool with substantially identical trading strategies, to aggregate all such positions, the no-action relief issued by the CFTC Division of Market Oversight on July 31, 2019, and extended on July 18, 2025, provides relief from this provision except in a situation where such person holds or controls the trading of such positions in order to willfully circumvent applicable position limits (see CFTC Letter No. 25-21).

Q9: **Are there exemptions from the account aggregation requirements?**

A9: Yes. Exemptions from aggregation in all contracts subject to Exchange position limits must comply with the provisions of CFTC Regulation 150.4(b). Parties must file with the Market Regulation Department via email at Market_Reg_Surveillance_Chgo@cmegroup.com, and the filing must include:

1. A description of the relevant circumstances that warrant disaggregation; and
2. A statement of a senior officer of the entity certifying that the conditions set forth in the applicable aggregation exemption provision have been met.

Filing for contracts not subject to federal positions limits may occur at any time prior to exceeding a position limit. After exceeding a position limit, filing should occur within a reasonable period of time, which is generally considered 5 business days.

For contracts subject to federal limits, the CFTC has specific timing requirements set forth in Regulation 150.4(c) (Notice filing for exemption) for which the CFTC Division of Market Oversight has extended no-action relief on July 18, 2025 (see CFTC Letter No. 25-21).

A market participant that files an exemption from account aggregation with the CFTC must also provide a copy of the CFTC filing to Market_Reg_Surveillance_Chgo@cmegroup.com.

Q10: How can a market participant obtain an exemption from position limits?

A10: A market participant seeking an exemption from position limits must apply by completing a form provided by the Department. Market participants may be eligible to receive an exemption from position limits in accordance with Rule 559 based on having bona fide hedging positions (as defined in CFTC Regulation §150.1 (Bona fide hedging transaction or positions), non-enumerated bona fide hedging positions and/or spread positions.

A market participant intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Department prior to exceeding such limits. However, a person who establishes a position in excess of position limits and files the required application for bona fide hedging transactions or positions or non-enumerated bona fide hedging transactions or positions with the Department will not be in violation of Rule 559 provided that the filing occurs within five (5) business days after

assuming the position, except in circumstances where the Department requires a person to file prior to the fifth business day. An application filed after exceeding a limit must include an explanation of the sudden or unforeseen bona fide hedging need.

In the event the positions in excess of the limits are not deemed to be exemption-eligible, the applicant and clearing firm will be in violation of speculative position limits for the period of time in which the excess positions remained open.

The Department may approve, deny, condition or limit any exemption request based on factors deemed by the Department to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner given characteristics of the market for which the exemption is sought.
A person who has received written authorization from the Department to exceed position limits must annually file an updated application no later than one year following the approval date of the most recent application. Further, for referenced contracts, a party applying for an extension of a non-enumerated bona fide hedging exemption must receive a notice of extension from the Exchange prior to exceeding the position limit after the expiration date of the current exemption.

Failure to file an updated application will result in expiration of the exemption.

To obtain an exemption application or for further information on the exemption application process, please contact the Department via email.

For CME and CBOT products: Hedgeprogram@cmegroup.com

For NYMEX and COMEX products: NYhedgeprogram@cmegroup.com

Q11: Are position limits effective intraday?

A11: Yes, any positions, including positions established intraday, in excess of those permitted under the rules are deemed to be position limit violations.

Q12: Do positions established as a result of Trading at Settlement ("TAS"), Trading at Marker ("TAM") or Basis Trade at Index Close ("BTIC") rules subject to position limits?

A12: Yes, in both intraday and at the end of the day. TAS, TAM and BTIC are pricing conventions for executions occurring in an underlying existing Exchange product, and as such, are included in determining compliance with position limits. For intraday purposes, the position is included immediately upon execution of the trade, and **not** when the settlement, marker or Index price is published.

Q13: Does an order that has been placed but not executed count for purposes of determining compliance with a position limit?

A13: No, unfilled orders do not constitute an open position for position limit purposes. Notwithstanding the foregoing, market participants should be aware of Rule 575 ("Disruptive Practice Prohibited") and the associated Market Regulation Advisory Notice with respect to order entries.

Q14: Are Clearing Members in violation of position limits if their clients exceed a limit?

A14: Except as set forth in the answer to FAQ 10, a clearing member shall not be in violation of position limits if it carries positions for its customers in excess of the applicable position limits for such reasonable period of time as the firm may require to discover and liquidate the excess positions. A reasonable period of time shall generally not exceed one business day.

Q15: What happens if a market participant exceeds a position limit and does not qualify for an exemption?

A15: Violation of a position limit is a strict liability offense. The Department will consider a number of factors in determining the appropriate regulatory action, including, but not limited to, the size of the position in excess of the limit, previous violations, length of the violation and profitability.

Rule Texts

CME and CBOT

Rule 559. POSITION LIMITS AND EXEMPTIONS

The position limit levels applicable to those contracts with position limits are set forth in the Position Limit, Position Accountability and Reportable Level Table ("Table") in the Interpretations Section at the end of Chapter 5.

A person seeking an exemption from position limits must apply to the Market Regulation Department on forms provided by the Exchange. In order to obtain an exemption from position limits, a person must:

1. Provide a description of the exemption sought, including whether the exemption is for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1 (Bona fide hedging transaction or position), non-enumerated bona fide hedging transactions or positions, or spread positions;
2. Provide a complete and accurate explanation of the underlying exposure related to the exemption request;
3. Agree to promptly provide, upon request by the Market Regulation Department, information or documentation regarding the person's financial condition;
4. Agree to comply with all terms, conditions or limitations imposed by the Market Regulation Department with respect to the exemption;
5. Agree that the Market Regulation Department may, for cause, modify or revoke the exemption at any time;
6. Agree to initiate and liquidate positions in an orderly manner;
7. Agree to comply with all Exchange rules; and
8. Agree to promptly submit a supplemental statement to the Market Regulation Department whenever there is a material change to the information provided in the most recent application.

A person intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Market Regulation Department prior to exceeding such limits. However, a person who establishes a position in excess of position limits and files the required application for bona fide hedging transactions or positions or non-enumerated bona fide hedging transactions or positions with the Market Regulation Department shall not be in violation of this rule provided the filing occurs within five (5) business days after assuming the position except in circumstances where the Market Regulation Department requires a person to file prior to the fifth business day. An application filed after exceeding a limit must include an explanation of the sudden or unforeseen bona fide hedging need. In the event the positions in excess of the limits are not deemed to be exemption-eligible, the applicant and clearing firm will be in violation of speculative limits for the period of time in which the excess positions remained open.

The Market Regulation Department shall, on the basis of the application and any requested supplemental information, determine whether an exemption from position limits shall be granted. The Market Regulation Department may approve, deny, condition or limit any exemption request based on factors deemed by the Department to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner given characteristics of the market for which the exemption is sought.

Nothing in this rule shall in any way limit (i) the authority of the Exchange to take emergency action; or (ii) the authority of the Market Regulation Department to review at any time the positions owned or controlled by any person and to direct that such position be reduced to the position limit provided for in the Table.

A person who has received written authorization from the Market Regulation Department to exceed position limits must annually file an updated application not later than one year following the approval date of the most recent application. Failure to file an updated application will result in expiration of the exemption.

559.A. Bona Fide Hedging Transactions or Positions

The Market Regulation Department may grant exemptions from position limits for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1.

Approved bona fide hedgers may be exempted from Exchange emergency orders that reduce position limits or restrict trading.

559.B. Non-Enumerated Bona Fide Hedging Transactions or Positions

1. Referenced Contracts (as defined in CFTC Regulation §150.1)

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions. For the purposes of this rule, non-enumerated bona fide hedging transactions or positions must meet the definition of a bona fide hedging transaction or position in CFTC Regulation §150.1. Any position involving a commodity index contract and one or more referenced contracts will not be recognized as a bona fide hedging transaction or position pursuant to this Section.

2. Contracts Not Subject to Federal Position Limits

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions which are held by or on behalf of an entity or an affiliate of an entity which typically buys, sells or holds positions in the underlying cash market, a related cash market, or a related over-the-counter market and for which the underlying market has a high degree of demonstrated liquidity relative to the size of the positions and where there exist opportunities for arbitrage which provide a close linkage between the futures or options market and the underlying market in question.

Any position involving swaps (excluding pass-through swaps) or commodity index contracts may be recognized as a bona fide hedging transaction or position pursuant to this Section.

559.C. Spread Positions

The Market Regulation Department may grant exemptions from the position limits for an intra-market spread, inter-market spread, intra-commodity spread, and inter-commodity spread, including calendar spread, quality spread, processing spread, product or by-product spread, or futures-options spread positions.

559.D. Aggregation of Positions

For the purpose of applying the position limits in the Table, all positions in accounts for which any person, by power of attorney or otherwise, directly or indirectly controls trading or holds a 10 percent or greater ownership or equity interest must be aggregated with the positions held and trading done by such person. For the purpose of determining the positions in accounts for which any person controls trading or holds a 10 percent or greater ownership or equity interest, positions or ownership or equity interests held by, and trading done or controlled by, two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by, or the trading were done or controlled by, a single person. Any person that, by power of attorney or otherwise, holds or controls the trading of positions in more than one account or pool with substantially identical trading strategies, must aggregate all such positions in accordance with the provisions of CFTC Regulation 150.4(a)(2).

559.E. Exemptions from Aggregation

Exemptions from aggregation in all products subject to Exchange position limits must comply with the provisions of CFTC Regulation 150.4(b).

Any person claiming an exemption from Exchange position limits under the provisions of CFTC Regulation 150.4(b)(1)(ii), (b)(2), (b)(3), (b)(4), or (b)(7) must provide a notice to the Market Regulation Department which sets forth 1) a description of the relevant circumstances that warrant disaggregation and 2) a statement by a senior officer or executive of the entity certifying that the conditions set forth in the applicable CFTC aggregation exemption provision have been met.

Upon request by the Market Regulation Department, any person claiming an exemption from aggregation under this Section E. must provide any requested information that demonstrates the person meets the applicable requirements for the exemption. Market Regulation, in its sole discretion, may amend, suspend, terminate, or otherwise modify a person's exemption from aggregation for failure to comply with the provisions of this Section E.

In the event of a material change to the information provided in any notice filed under this Section E., an updated or amended notice must be promptly filed with the Market Regulation Department detailing the material change.

559.F. Violations

Violations of position limits and approved exemption limits are subject to the provisions of Rule 562.

NYMEX/COMEX

Rule 559. POSITION LIMITS AND EXEMPTIONS

The position limit levels applicable to those contracts with position limits are set forth in the Position Limit, Position Accountability and Reportable Level Table ("Table") in the Interpretations Section at the end of Chapter 5.

A person seeking an exemption from position limits must apply to the Market Regulation Department on forms provided by the Exchange. In order to obtain an exemption from position limits, a person must:

1. Provide a description of the exemption sought, including whether the exemption is for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1 (Bona fide hedging transaction or position), non-enumerated bona fide hedging transactions or positions, or spread positions;
2. Provide a complete and accurate explanation of the underlying exposure related to the exemption request;
3. Agree to promptly provide, upon request by the Market Regulation Department, information or documentation regarding the person's financial condition;
4. Agree to comply with all terms, conditions or limitations imposed by the Market Regulation Department with respect to the exemption;
5. Agree that the Market Regulation Department may, for cause, modify or revoke the exemption at any time;
6. Agree to initiate and liquidate positions in an orderly manner;
7. Agree to comply with all Exchange rules; and
8. Agree to promptly submit a supplemental statement to the Market Regulation Department whenever there is a material change to the information provided in the most recent application.

A person intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Market Regulation Department prior to exceeding such limits. However, a person who establishes a position in excess of position limits and files the required application for bona fide hedging transactions or positions or non-enumerated bona fide hedging transactions or positions with the Market Regulation Department shall not be in violation of this rule provided the filing occurs within five (5) business days after assuming the position except in circumstances where the Market Regulation Department requires a person to file prior to the fifth business day. An application filed after exceeding a limit must include an explanation of the sudden or unforeseen bona fide hedging need. In the event the positions in excess of the limits are not deemed to be exemption-eligible, the applicant and clearing firm will be in violation of speculative limits for the period of time in which the excess positions remained open.

The Market Regulation Department shall, on the basis of the application and any requested supplemental information, determine whether an exemption from position limits shall be granted. The Market Regulation Department may approve, deny, condition or limit any exemption request based on factors deemed by the Department to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner given characteristics of the market for which the exemption is sought.

Nothing in this rule shall in any way limit (i) the authority of the Exchange to take emergency action; or (ii) the authority of the Market Regulation Department to review at any time the positions owned or controlled by any person and to direct that such position be reduced to the position limit provided for in the Table.

A person who has received written authorization from the Market Regulation Department to exceed position limits must annually file an updated application not later than one year following the approval date of the most recent application. Failure to file an updated application will result in expiration of the exemption.

559.A. Bona Fide Hedging Transactions or Positions

The Market Regulation Department may grant exemptions from position limits for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1.

Approved bona fide hedgers may be exempted from Exchange emergency orders that reduce position limits or restrict trading.

559.B. Non-Enumerated Bona Fide Hedging Transactions or Positions

1. Referenced Contracts (as defined in CFTC Regulation §150.1)

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions. For the purposes of this rule, non-enumerated bona fide hedging transactions or positions must meet the definition of a bona fide hedging transaction or position in CFTC Regulation §150.1. Any position involving a commodity index contract and one or more referenced contracts will not be recognized as a bona fide hedging transaction or position pursuant to this Section.

2. Contracts Not Subject to Federal Position Limits

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions which are held by or on behalf of an entity or an affiliate of an entity which typically buys, sells or holds positions in the underlying cash market, a related cash market, or a related over-the-counter market and for which the underlying market has a high degree of demonstrated liquidity relative to the size of the positions and where there exist opportunities for arbitrage which provide a close linkage between the futures or options market and the underlying market in question.

Any position involving swaps (excluding pass-through swaps) or commodity index contracts may be recognized as a bona fide hedging transaction or position pursuant to this Section.

559.C. Spread Positions

The Market Regulation Department may grant exemptions from the position limits for an intra-market spread, inter-market spread, intra-commodity spread, and inter-commodity spread, including calendar spread, quality spread, processing spread, product or by-product spread, or futures-options spread positions.

559.D. Aggregation of Positions

For the purpose of applying the position limits in the Table, all positions in accounts for which any person, by power of attorney or otherwise, directly or indirectly controls trading or holds a 10 percent or greater ownership or equity interest must be aggregated with the positions held and trading done by such person. For the purpose of determining the positions in accounts for which any person controls trading or holds a 10 percent or greater ownership or equity interest, positions or ownership or equity interests held by, and trading done or controlled by, two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by, or the trading were done or controlled by, a single person. Any person that, by power of attorney or otherwise, holds or controls the trading of positions in more than one account or pool with substantially identical trading strategies, must aggregate all such positions in accordance with the provisions of CFTC Regulation 150.4(a)(2).

559.E. Exemptions from Aggregation

Exemptions from aggregation in all products subject to Exchange position limits must comply with the provisions of CFTC Regulation 150.4 (b). Any person claiming an exemption from Exchange position limits under the provisions of CFTC Regulation 150.4(b)(1)(ii), (b)(2), (b)(3), (b)(4), or (b)(7) must provide a notice to the Market Regulation Department which sets forth 1) a description of the relevant circumstances that warrant disaggregation and 2) a statement by a senior officer or executive of the entity certifying that the conditions set forth in the applicable CFTC aggregation exemption provision have been met. Upon request by the Market Regulation Department, any person claiming an exemption from aggregation under this Section E. must provide any requested information that demonstrates the person meets the applicable requirements for the exemption. Market Regulation, in its sole discretion, may amend, suspend, terminate, or otherwise modify a person's exemption from aggregation for failure to comply with the provisions of this Section E. In the event of a material change to the information provided in any notice filed under this Section E., an updated or amended notice must be promptly filed with the Market Regulation Department detailing the material change.

559.F. Conditional Limit in NYMEX Last Day Financial Natural Gas Contracts

The Market Regulation Department may grant a Conditional limit in Last Day Financial Natural Gas contracts of up to the equivalent of ten thousand (10,000) NYMEX Physical Natural Gas Contracts (NG) during the period that position limits are applicable. Any participant seeking such exemption must agree: (1) not to hold a position in the NG contract during the last three days of trading; (2) provide the Exchange information on the complete book of all positions related to the Henry Hub; and (3) any other information /documentation required by the Exchange

559.G. Violations

Violations of position limits and approved exemption limits are subject to the provisions of Rule 562.

CME and CBOT

Rule 560. POSITION ACCOUNTABILITY

A person who owns or controls positions in contracts traded on the Exchange or cleared by the Clearing House in excess of reportable levels or subject to accountability levels shall keep records, including records of their activity in the underlying commodity and related derivative markets, and make such records available, upon request, to the Exchange.

Upon request by the Market Regulation Department, such person shall also provide information relating to the positions owned or controlled by that person including, but not limited to, the nature and size of the position, the trading strategy employed with respect to the position, and hedging information, if applicable.

For purposes of this rule, all positions in accounts for which a person, by power of attorney or otherwise, directly or

indirectly holds positions or controls trading shall be included with the positions held by such person. Additionally, positions held by two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by a single person.

If the person from whom such records or information is requested fails to comply as directed, the Market Regulation Department may order the reduction of such position, in addition to taking disciplinary action as a result of such failure.

A person who exceeds position accountability or position limit levels as a result of maintaining positions at more than one clearing firm shall be deemed to have waived confidentiality regarding their position and the identity of the clearing members at which the positions are maintained.

A person who holds or controls aggregate positions in excess of specified position accountability levels or in excess of position limits pursuant to an approved exemption shall be deemed to have consented, when so ordered by the Market Regulation Department, not to further increase the positions, to comply with any prospective limit which exceeds the size of the position owned or controlled, or to reduce any open position which exceeds position accountability or position limit levels. Any order to reduce an open position shall be issued by the Chief Regulatory Officer or their designee, if they determine in their sole discretion, that such action is necessary to maintain an orderly market.

A clearing member that carries positions for another person shall be responsible for taking reasonable and diligent actions to effect the timely compliance with any order issued pursuant to this rule upon notification of such order by the Market Regulation Department.

All positions must be initiated and liquidated in an orderly manner.

NYMEX/COMEX

Rule 560. POSITION ACCOUNTABILITY

A person who owns or controls positions in excess of reportable levels or where such Person otherwise holds substantial positions in contracts traded on the Exchange or cleared by the Clearing House shall keep records, including records of their activity in the underlying commodity and related derivative markets, and make such records available, upon request, to the Exchange.

Upon request by the Market Regulation Department, such person shall also provide information relating to the positions owned or controlled by that person including, but not limited to, the nature and size of the position, the trading strategy employed with respect to the position, and hedging information, if applicable.

For purposes of this rule, all positions in accounts for which a person, by power of attorney or otherwise, directly or indirectly holds positions or controls trading shall be included with the positions held by such person. Additionally, positions held by two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by a single person.

If the person from whom such records or information is requested fails to comply as directed, the Market Regulation Department may order the reduction of such position, in addition to taking disciplinary action as a result of such failure.

A person who exceeds position accountability or position limit levels as a result of maintaining positions at more than one clearing firm shall be deemed to have waived confidentiality regarding their position and the identity of the clearing members at which the positions are maintained.

A person who holds or controls aggregate positions in excess of specified position accountability levels or in excess of position limits pursuant to an approved exemption shall be deemed to have consented, when so ordered by the Market Regulation Department, not to further increase the positions, to comply with any prospective limit which exceeds the size of the position owned or controlled, or to reduce any open position which exceeds position accountability or position limit levels. Any order to reduce an open position shall be issued by the Chief Regulatory Officer or their designee, if they determine in their sole discretion, that such action is necessary to maintain an orderly market.

A clearing member that carries positions for another person shall be responsible for taking reasonable and diligent actions to effect the timely compliance with any order issued pursuant to this rule upon notification of such order by the Market Regulation Department.

All positions must be initiated and liquidated in an orderly manner.

CME, CBOT, and NYMEX/COMEX

Rule 562. POSITION LIMIT VIOLATIONS

Any positions, including positions established intraday, in excess of those permitted under the rules of the Exchange shall be deemed position limit violations.

If a position exceeds position limits as a result of an option assignment, the person who owns or controls such position shall be allowed one business day to liquidate the excess position without being considered in violation of the limits. Additionally, if, at the close of trading, a position that includes options exceeds position limits when evaluated using the delta factors as of that day's close of trading, but does not exceed the limits when evaluated using the previous day's delta factors, then the position shall not constitute a position limit violation.

A clearing member shall not be in violation of this rule if it carries positions for its customers in excess of the applicable position limits for such reasonable period of time as the firm may require to discover and liquidate the excess positions. For the purposes of this rule, a reasonable period of time shall generally not exceed one business day.

A customer who exceeds the position limits as a result of maintaining positions at more than one clearing member shall be deemed to have waived confidentiality regarding their positions and the identity of the clearing members at which they are maintained. A clearing member carrying such positions shall not be in violation of this rule if, upon notification by the Market Regulation Department, it liquidates its pro-rata share of the position in excess of the limits or otherwise ensures the customer is in compliance with the limits within a reasonable period of time. For purposes of this rule, a reasonable period of time shall generally not exceed one business day.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Position Limits and Accountability Levels**
Rule References	**Rules 559, 560, and 562**
Advisory Date	**February 26, 2026**
Advisory Number	**CME Group RA2601-5**
Effective Date	**March 12, 2026**

Effective on trade date March 12, 2026, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory will supersede CME Group Market Regulation Advisory Notice RA2502-5 from July 29, 2025. It is being issued in connection with the November 2025 amendment to the spot month position limit in Oat futures contracts (See Market Surveillance Notice #MSN09-16-25). Specifically, Q&A 3 is amended to identify Oats as having a limit of 500 registered and outstanding shipping certificates/warehouse receipts issued by facilities designated by the Exchange as regular to issue shipping certificates unless they have received a hedge exemption. This limit was previously 600 registered and outstanding shipping certificates/warehouse receipts in Oats. The amendment is intended to bring the limit in line with the previously certified amendment to the spot month position limit.

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

For NYMEX and COMEX Products

Tom Dixon, Sr. Director, 212.299.2901
Chris Reinhardt, Exec. Director, 312.435.3665

For CME and CBOT Products

Nicole Pecyna, Director, 312.341.7713
Brian Babinski, Director, 312.341.5822
William Lange, Director, 312.341.7757
Chris Reinhardt, Exec. Director, 312.435.3665

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.

FAQ Related to Position Limits, Position Accountability and Reportable Levels

Q1: What is the difference between Position Limits, Accountability and Reportable Levels?

A1: **Position Limits** are levels which a market participant may **not** exceed unless they have an approved exemption. Any positions in excess of these limits would be considered a rule violation pursuant to Rule 562.

Position Limits are calculated on a net futures-equivalent basis by contract and include contracts that aggregate into one or more base contracts as set forth in the Table.

Position Accountability Levels are levels which a market participant may exceed and not be in violation of an Exchange Rule. A market participant who exceeds an accountability (or reportable) level may be asked by the Market Regulation Department (the "Department") to provide information relating to the position, including, but not limited to, the nature and size of the position, the trading strategy employed with respect to the position, and hedging information, if

applicable. Failure to supply the requested information may result in an order to reduce such positions, in addition to disciplinary action as a result of the failure.

Additionally, any market participant who has a position in excess of an accountability level is deemed to have consented, when so ordered by the Department to:

- not further increase the positions;
- comply with any limit on the size of the position; and/or
- reduce any open position which exceeds a position accountability level.

Generally, these actions would be taken only after having been contacted by the Department regarding the open positions.

The Department calculates positions using three separate methods for purposes of its position accountability reviews. Any position that exceeds an accountability level based on any of the three methods is considered by the Department to be in excess of the accountability level. The three methods are as follows:

1. Spot Month/Single Month/All Month Accountability Levels are calculated on a net futures-equivalent basis by contract and include contracts that aggregate into one or more base contracts as set forth in the Table.

2. Spot Month/Single Month/All Month Accountability Levels are calculated on a net futures-only basis.

3. Spot Month/Single Month/All Month Accountability Levels for options are calculated per option quadrant (long call, long put, short call, short put) on a gross basis.

Reportable Levels are levels at which clearing members, omnibus accounts and foreign brokers are required to submit to the Exchange a daily report of all positions as set forth in the Table. Positions at or above the reportable level in a particular expiration month of a futures contract, or in all puts or in all calls of a particular option contract expiration month, trigger the reportable status. A person who is reportable in a particular product must report **all open positions** in all futures and in all open puts or calls on such futures in the product and in any product that aggregates into the product, **regardless of size**.

Market participants should be aware that not all products have position limits or position accountability levels. Position limits, position accountability levels and reportable levels are listed in each Exchange's Table and may be accessed via the following link:
http://www.cmegroup.com/market-regulation/position-limits.html

Q2: What is the difference between Spot Month, Second Spot Month, Single Month and All Month for purposes of position limits and position accountability levels, and when do they go into effect?

A2: **Spot Month** generally goes into effect as a particular contract month becomes the closest contract month to expiration or as a contract nears expiration. The dates vary by contract and market participants should reference the Table to identify when the spot month limits go into effect. For example, NYMEX RBOB Gasoline futures has a spot month limit of 2,000 net futures-equivalent contracts that becomes effective at the close of trading three business days prior to the last trading day of the contract month.

Subsequent Spot Month limits are lower than spot month limits and go into effect after the initial spot month limit, as the contract month nears expiration. For example, in CME Live Cattle futures

the spot month limit is reduced from 600 net futures-equivalent contracts effective at the close of trading on the first business day following the first Friday of the contract month to 300 net futures-equivalent contracts effective at the close of trading on the business day immediately preceding the last 5 trading days of the contract month. Additionally, the limit changes from 300 to 200 at the close of trading on the business day prior to the last 2 trading days of the contract month.

Single Month is defined as the position held in any given contract month outside of the spot period effective date. For example, a CBOT December 2023 Corn futures contract has a single month limit of 57,800 net futures-equivalent contracts prior to the spot month effective date.

All Month is defined as the net open position held across all contract months of a particular product and is effective at all times. For example, the CME S&P 500 Stock Price Index futures all month limit is 60,000 net futures-equivalent contracts. If a market participant is long 32,000 September 2021 contracts, long 30,000 December 2021 contracts and short 1,000 March 2021 contracts, the all month position is long 61,000 net futures-equivalent contracts. They would be over the all month limit by 1,000 contracts.

The Department publishes a monthly notice of spot month effective dates for core products. The notice is posted on the CME Group website and is also available via an email subscription.

Website: Select Category – Market Regulation & Market Surveillance Notices

In order to receive the notice via email, you will need to create a CME Group login and go to the Subscription Center page. Once there, select Market Regulation Advisories – Market Surveillance Notices.

Q3: Are there limits for holding delivery instruments?

A3: Yes, for the CBOT products specified below. No person shall own or control more than the below amount of registered and outstanding shipping certificates/warehouse receipts issued by facilities designated by the Exchange as regular to issue shipping certificates unless they have received a hedge exemption from the Exchange. This includes any mini-sized certificates (in futures equivalent contracts). If a person is stopped for delivery in a quantity that would cause such person to exceed the certificate limit, the person must cancel, retender, or sell the quantity of certificates in excess of the limit no later than the close of business on the following business day. Failure to do so constitutes a position limit violation. Please see FAQ 4 for information concerning deliveries in physically-delivered metals contracts.

Corn	1,200	Wheat	1,200
Soybean	1,200	Oat	500
Soybean Oil	1,100	Rough Rice	800
Soybean Meal	1,500	KC Wheat	1,200

Q4: Do deliveries in physically-delivered metals contracts impact the futures position in the spot month for purposes of compliance with spot month position limits?

A4: Effective for the April 2021 contracts and beyond, in physically-delivered metals contracts, the spot month position limit will be applied and enforced separately for futures and for deliveries during the spot month. For example, the Gold futures contract has a spot month position limit of 6,000 contracts and no person may hold more than 6,000 Gold futures contracts (on a net futures-equivalent basis) during the spot month unless they have received a hedge exemption from the Exchange. Separately, a participant may not make (issue) or take (stop) delivery of

more than 6,000 net futures-equivalent contracts during the spot month unless they have received a hedge exemption from the Exchange. If a person stops certificates for delivery in a quantity that would cause such person to exceed the certificate limit, the person must retender the quantity of certificates in excess of the limit no later than the close of business on the following business day. Failure to do so constitutes a position limit violation.
Given that the spot month limit is applied separately for futures and for deliveries, no netting between futures and deliveries is permitted.

Q5: How does aggregation of contracts work?

A5: The aggregation of contracts for single month, all month and spot month are noted in each Table.

Using the spot month as an example, for a contract that aggregates into only one base contract during the spot month, the base contract will be identified in the "Spot Month Aggregate Into Futures Equivalent Leg (1)" column of the Table and will denote a positive correlation with the base contract. The aggregation ratio for the Leg (1) base contract will be identified in the "Aggregate Into Ratio Leg (1)" column of the Table.

For contracts that aggregate into two separate base contracts during the spot month, the base contract noted in the "Spot Month Aggregate Into Futures Equivalent Leg (1)" column of the Table will denote a positive correlation, and the aggregation ratio for the Leg (1) base contract will be identified in the "Aggregate Into Ratio Leg (1)" column of the Table. The base contract noted in the "Spot Month Aggregate Into Futures Equivalent Leg (2)" column of the Table will denote a negative correlation with respect to the base contract, and the aggregation ratio for the Leg (2) base contract will be identified in the "Aggregate Into Ratio Leg (2)" column of the Table**.**

Q6: How are options on futures counted for purposes of position limits?

A6: Options on futures positions are aggregated into the underlying futures contracts in accordance with the Table on a delta equivalent value.

If a position exceeds position limits as a result of an option assignment, the person who owns or controls such position shall be allowed one business day to liquidate the excess position without being considered in violation of the limits. Additionally, if, at the close of trading, a position that includes options exceeds position limits when evaluated using the delta factors as of that day's close of trading, but does not exceed the limits when evaluated using the previous day's delta factors, then the position shall not constitute a position limit violation.

Q7: What does a diminishing balance contract mean and how do you calculate its futures equivalence?

A7: Diminishing balance contracts are specific futures contracts whose front month position in any given contract month diminishes as the contract month progresses towards expiration/month end for purposes of position limits. Typically, a contract diminishes each Exchange business day a portion of the final settlement price is established. The number of Exchange business days varies depending on the calendar month, and in calculating a diminishing balance, market participants should exclude the calendar date of any U.S. holiday as set forth in the CME Globex Holiday Calendar available on the CME Group website.

Diminishing balance contracts are typically those where the final settlement price is equal to the arithmetic average of a determined referenced price for each business day that it is determined during the contract month; or the balance of the month average of a determined referenced price

for each business day that it is determined during the contract month, starting from the selected start date through the end of the contract month, inclusive.

Diminishing balance contracts are identified as such in the Table.

An example of a diminishing balance contract and its futures-equivalent value is set forth below.

Example 1: Chicago CBOB Gasoline (Platts) Futures (commodity code "2C")

Customer holds 6,600 October 2015 "2C" contracts going into October 2015 and does not add or liquidate any positions during the month.

	Futures Position	Futures Equivalent Position
Start of Day Position	2C October 2015 Contract	2C October 2015 Contract
10/1/2015	6,600	6,600
10/2/2015	6,600	6,300
10/5/2015	6,600	6,000
10/6/2015	6,600	5,700
10/7/2015	6,600	5,400
10/8/2015	6,600	5,100
10/9/2015	6,600	4,800
10/12/2015	6,600	4,500
10/13/2015	6,600	4,200
10/14/2015	6,600	3,900
10/15/2015	6,600	3,600
10/16/2015	6,600	3,300
10/19/2015	6,600	3,000
10/20/2015	6,600	2,700
10/21/2015	6,600	2,400
10/22/2015	6,600	2,100
10/23/2015	6,600	1,800
10/26/2015	6,600	1,500
10/27/2015	6,600	1,200
10/28/2015	6,600	900
10/29/2015	6,600	600
10/30/2015	6,600	300

Q8: How does aggregation of accounts work with respect to position limits and position accountability levels?

A8: Aggregation of positions is based on ownership or control. All positions in accounts for which any person, by power of attorney or otherwise, directly or indirectly controls trading or holds a 10 percent or greater ownership or equity interest must be aggregated with the position held and trading done by such person. For the purpose of determining the positions in accounts for which any person controls trading or holds a 10 percent or greater ownership or equity interest, positions or ownership

or equity interests held by, and trading done or controlled by, two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by, or the trading were done or controlled by, a single person.

While CFTC Regulation 150.4(a)(2) requires any person that, by power of attorney or otherwise, holds or controls the trading of positions in more than one account or pool with substantially identical trading strategies, to aggregate all such positions, the no-action relief issued by the CFTC Division of Market Oversight on July 31, 2019, and extended on July 18, 2025, provides relief from this provision except in a situation where such person holds or controls the trading of such positions in order to willfully circumvent applicable position limits (see CFTC Letter No. 25-21).

Q9: **Are there exemptions from the account aggregation requirements?**

A9: Yes. Exemptions from aggregation in all contracts subject to Exchange position limits must comply with the provisions of CFTC Regulation 150.4(b). Parties must file with the Market Regulation Department via email at Market_Reg_Surveillance_Chgo@cmegroup.com, and the filing must include:

1. A description of the relevant circumstances that warrant disaggregation; and
2. A statement of a senior officer of the entity certifying that the conditions set forth in the applicable aggregation exemption provision have been met.

Filing for contracts not subject to federal positions limits may occur at any time prior to exceeding a position limit. After exceeding a position limit, filing should occur within a reasonable period of time, which is generally considered 5 business days.

For contracts subject to federal limits, the CFTC has specific timing requirements set forth in Regulation 150.4(c) (Notice filing for exemption) for which the CFTC Division of Market Oversight has extended no-action relief on July 18, 2025 (see CFTC Letter No. 25-21).

A market participant that files an exemption from account aggregation with the CFTC must also provide a copy of the CFTC filing to Market_Reg_Surveillance_Chgo@cmegroup.com.

Q10: How can a market participant obtain an exemption from position limits?

A10: A market participant seeking an exemption from position limits must apply by completing a form provided by the Department. Market participants may be eligible to receive an exemption from position limits in accordance with Rule 559 based on having bona fide hedging positions (as defined in CFTC Regulation §150.1 (Bona fide hedging transaction or positions), non-enumerated bona fide hedging positions and/or spread positions.

A market participant intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Department prior to exceeding such limits. However, a person who establishes a position in excess of position limits and files the required application for bona fide hedging transactions or positions or non-enumerated bona fide hedging transactions or positions with the Department will not be in violation of Rule 559 provided that the filing occurs within five (5) business days after assuming the position, except in circumstances where the Department requires a person to file prior to the fifth business day. An application filed after exceeding a limit must include an explanation of the sudden or unforeseen bona fide hedging need.

In the event the positions in excess of the limits are not deemed to be exemption-eligible, the applicant and clearing firm will be in violation of speculative position limits for the period of time in which the excess positions remained open.

The Department may approve, deny, condition or limit any exemption request based on factors deemed by the Department to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner given characteristics of the market for which the exemption is sought.
A person who has received written authorization from the Department to exceed position limits must annually file an updated application no later than one year following the approval date of the most recent application. Further, for referenced contracts, a party applying for an extension of a non-enumerated bona fide hedging exemption must receive a notice of extension from the Exchange prior to exceeding the position limit after the expiration date of the current exemption.

Failure to file an updated application will result in expiration of the exemption.

To obtain an exemption application or for further information on the exemption application process, please contact the Department via email.

For CME and CBOT products: Hedgeprogram@cmegroup.com

For NYMEX and COMEX products: NYhedgeprogram@cmegroup.com

Q11: Are position limits effective intraday?

A11: Yes, any positions, including positions established intraday, in excess of those permitted under the rules are deemed to be position limit violations.

Q12: Do positions established as a result of Trading at Settlement ("TAS"), Trading at Marker ("TAM") or Basis Trade at Index Close ("BTIC") rules subject to position limits?

A12: Yes, in both intraday and at the end of the day. TAS, TAM and BTIC are pricing conventions for executions occurring in an underlying existing Exchange product, and as such, are included in determining compliance with position limits. For intraday purposes, the position is included immediately upon execution of the trade, and **not** when the settlement, marker or Index price is published.

Q13: Does an order that has been placed but not executed count for purposes of determining compliance with a position limit?

A13: No, unfilled orders do not constitute an open position for position limit purposes. Notwithstanding the foregoing, market participants should be aware of Rule 575 ("Disruptive Practice Prohibited") and the associated Market Regulation Advisory Notice with respect to order entries.

Q14: Are Clearing Members in violation of position limits if their clients exceed a limit?

A14: Except as set forth in the answer to FAQ 10, a clearing member shall not be in violation of position limits if it carries positions for its customers in excess of the applicable position limits for such reasonable period of time as the firm may require to discover and liquidate the excess positions. A reasonable period of time shall generally not exceed one business day.

Q15: What happens if a market participant exceeds a position limit and does not qualify for an exemption?

A15: Violation of a position limit is a strict liability offense. The Department will consider a number of factors in determining the appropriate regulatory action, including, but not limited to, the size of the position in excess of the limit, previous violations, length of the violation and profitability.

Rule Texts

CME and CBOT

Rule 559. POSITION LIMITS AND EXEMPTIONS

The position limit levels applicable to those contracts with position limits are set forth in the Position Limit, Position Accountability and Reportable Level Table ("Table") in the Interpretations Section at the end of Chapter 5.

A person seeking an exemption from position limits must apply to the Market Regulation Department on forms provided by the Exchange. In order to obtain an exemption from position limits, a person must:

1. Provide a description of the exemption sought, including whether the exemption is for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1 (Bona fide hedging transaction or position), non-enumerated bona fide hedging transactions or positions, or spread positions;
2. Provide a complete and accurate explanation of the underlying exposure related to the exemption request;
3. Agree to promptly provide, upon request by the Market Regulation Department, information or documentation regarding the person's financial condition;
4. Agree to comply with all terms, conditions or limitations imposed by the Market Regulation Department with respect to the exemption;
5. Agree that the Market Regulation Department may, for cause, modify or revoke the exemption at any time;
6. Agree to initiate and liquidate positions in an orderly manner;
7. Agree to comply with all Exchange rules; and
8. Agree to promptly submit a supplemental statement to the Market Regulation Department whenever there is a material change to the information provided in the most recent application.

A person intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Market Regulation Department prior to exceeding such limits. However, a person who establishes a position in excess of position limits and files the required application for bona fide hedging transactions or positions or non-enumerated bona fide hedging transactions or positions with the Market Regulation Department shall not be in violation of this rule provided the filing occurs within five (5) business days after assuming the position except in circumstances where the Market Regulation Department requires a person to file prior to the fifth business day. An application filed after exceeding a limit must include an explanation of the sudden or unforeseen bona fide hedging need. In the event the positions in excess of the limits are not deemed to be exemption-eligible, the applicant and clearing firm will be in violation of speculative limits for the period of time in which the excess positions remained open.

The Market Regulation Department shall, on the basis of the application and any requested supplemental information, determine whether an exemption from position limits shall be granted. The Market Regulation Department may approve, deny, condition or limit any exemption request based on factors deemed by the Department to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner given characteristics of the market for which the exemption is sought.

Nothing in this rule shall in any way limit (i) the authority of the Exchange to take emergency action; or (ii) the authority of the Market Regulation Department to review at any time the positions owned or controlled by any person and to direct that such position be reduced to the position limit provided for in the Table.

A person who has received written authorization from the Market Regulation Department to exceed position limits must annually file an updated application not later than one year following the approval date of the most recent application. Failure to file an updated application will result in expiration of the exemption.

559.A. Bona Fide Hedging Transactions or Positions

The Market Regulation Department may grant exemptions from position limits for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1.

Approved bona fide hedgers may be exempted from Exchange emergency orders that reduce position limits or restrict trading.

559.B. Non-Enumerated Bona Fide Hedging Transactions or Positions

1. Referenced Contracts (as defined in CFTC Regulation §150.1)

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions. For the purposes of this rule, non-enumerated bona fide hedging transactions or positions must meet the definition of a bona fide hedging transaction or position in CFTC Regulation §150.1. Any position involving a commodity index contract and one or more referenced contracts will not be recognized as a bona fide hedging transaction or position pursuant to this Section.

2. Contracts Not Subject to Federal Position Limits

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions which are held by or on behalf of an entity or an affiliate of an entity which typically buys, sells or holds positions in the underlying cash market, a related cash market, or a related over-the-counter market and for which the underlying market has a high degree of demonstrated liquidity relative to the size of the positions and where there exist opportunities for arbitrage which provide a close linkage between the futures or options market and the underlying market in question.

Any position involving swaps (excluding pass-through swaps) or commodity index contracts may be recognized as a bona fide hedging transaction or position pursuant to this Section.

559.C. Spread Positions

The Market Regulation Department may grant exemptions from the position limits for an intra-market spread, inter-market spread, intra-commodity spread, and inter-commodity spread, including calendar spread, quality spread, processing spread, product or by-product spread, or futures-options spread positions.

559.D. Aggregation of Positions

For the purpose of applying the position limits in the Table, all positions in accounts for which any person, by power of attorney or otherwise, directly or indirectly controls trading or holds a 10 percent or greater ownership or equity interest must be aggregated with the positions held and trading done by such person. For the purpose of determining the positions in accounts for which any person controls trading or holds a 10 percent or greater ownership or equity interest, positions or ownership or equity interests held by, and trading done or controlled by, two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by, or the trading were done or controlled by, a single person. Any person that, by power of attorney or otherwise, holds or controls the trading of positions in more than one account or pool with substantially identical trading strategies, must aggregate all such positions in accordance with the provisions of CFTC Regulation 150.4(a)(2).

559.E. Exemptions from Aggregation

Exemptions from aggregation in all products subject to Exchange position limits must comply with the provisions of CFTC Regulation 150.4(b).

Any person claiming an exemption from Exchange position limits under the provisions of CFTC Regulation 150.4(b)(1)(ii), (b)(2), (b)(3), (b)(4), or (b)(7) must provide a notice to the Market Regulation Department which sets forth 1) a description of the relevant circumstances that warrant disaggregation and 2) a statement by a senior officer or executive of the entity certifying that the conditions set forth in the applicable CFTC aggregation exemption provision have been met.

Upon request by the Market Regulation Department, any person claiming an exemption from aggregation under this Section E. must provide any requested information that demonstrates the person meets the applicable requirements for the exemption. Market Regulation, in its sole discretion, may amend, suspend, terminate, or otherwise modify a person's exemption from aggregation for failure to comply with the provisions of this Section E.

In the event of a material change to the information provided in any notice filed under this Section E., an updated or amended notice must be promptly filed with the Market Regulation Department detailing the material change.

559.F. Violations

Violations of position limits and approved exemption limits are subject to the provisions of Rule 562.

NYMEX/COMEX

Rule 559. POSITION LIMITS AND EXEMPTIONS

The position limit levels applicable to those contracts with position limits are set forth in the Position Limit, Position Accountability and Reportable Level Table ("Table") in the Interpretations Section at the end of Chapter 5.

A person seeking an exemption from position limits must apply to the Market Regulation Department on forms provided by the Exchange. In order to obtain an exemption from position limits, a person must:

1. Provide a description of the exemption sought, including whether the exemption is for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1 (Bona fide hedging transaction or position), non-enumerated bona fide hedging transactions or positions, or spread positions;
2. Provide a complete and accurate explanation of the underlying exposure related to the exemption request;
3. Agree to promptly provide, upon request by the Market Regulation Department, information or documentation regarding the person's financial condition;
4. Agree to comply with all terms, conditions or limitations imposed by the Market Regulation Department with respect to the exemption;
5. Agree that the Market Regulation Department may, for cause, modify or revoke the exemption at any time;
6. Agree to initiate and liquidate positions in an orderly manner;
7. Agree to comply with all Exchange rules; and
8. Agree to promptly submit a supplemental statement to the Market Regulation Department whenever there is a material change to the information provided in the most recent application.

A person intending to exceed position limits, including limits established pursuant to a previously approved exemption, must file the required application and receive approval from the Market Regulation Department prior to exceeding such limits. However, a person who establishes a position in excess of position limits and files the required application for bona fide hedging transactions or positions or non-enumerated bona fide hedging transactions or positions with the Market Regulation Department shall not be in violation of this rule provided the filing occurs within five (5) business days after assuming the position except in circumstances where the Market Regulation Department requires a person to file prior to the fifth business day. An application filed after exceeding a limit must include an explanation of the sudden or unforeseen bona fide hedging need. In the event the positions in excess of the limits are not deemed to be exemption-eligible, the applicant and clearing firm will be in violation of speculative limits for the period of time in which the excess positions remained open.

The Market Regulation Department shall, on the basis of the application and any requested supplemental information, determine whether an exemption from position limits shall be granted. The Market Regulation Department may approve, deny, condition or limit any exemption request based on factors deemed by the Department to be relevant, including, but not limited to, the applicant's business needs and financial status, as well as whether the positions can be established and liquidated in an orderly manner given characteristics of the market for which the exemption is sought.

Nothing in this rule shall in any way limit (i) the authority of the Exchange to take emergency action; or (ii) the authority of the Market Regulation Department to review at any time the positions owned or controlled by any person and to direct that such position be reduced to the position limit provided for in the Table.

A person who has received written authorization from the Market Regulation Department to exceed position limits must annually file an updated application not later than one year following the approval date of the most recent application. Failure to file an updated application will result in expiration of the exemption.

559.A. Bona Fide Hedging Transactions or Positions

The Market Regulation Department may grant exemptions from position limits for bona fide hedging transactions or positions as defined in CFTC Regulation §150.1.

Approved bona fide hedgers may be exempted from Exchange emergency orders that reduce position limits or restrict trading.

559.B. Non-Enumerated Bona Fide Hedging Transactions or Positions

1. Referenced Contracts (as defined in CFTC Regulation §150.1)

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions. For the purposes of this rule, non-enumerated bona fide hedging transactions or positions must meet the definition of a bona fide hedging transaction or position in CFTC Regulation §150.1. Any position involving a commodity index contract and one or more referenced contracts will not be recognized as a bona fide hedging transaction or position pursuant to this Section.

2. Contracts Not Subject to Federal Position Limits

The Market Regulation Department may grant exemptions from the position limits for non-enumerated bona fide hedging transactions or positions which are held by or on behalf of an entity or an affiliate of an entity which typically buys, sells or holds positions in the underlying cash market, a related cash market, or a related over-the-counter market and for which the underlying market has a high degree of demonstrated liquidity relative to the size of the positions and

where there exist opportunities for arbitrage which provide a close linkage between the futures or options market and the underlying market in question.

Any position involving swaps (excluding pass-through swaps) or commodity index contracts may be recognized as a bona fide hedging transaction or position pursuant to this Section.

559.C. Spread Positions

The Market Regulation Department may grant exemptions from the position limits for an intra-market spread, inter-market spread, intra-commodity spread, and inter-commodity spread, including calendar spread, quality spread, processing spread, product or by-product spread, or futures-options spread positions.

559.D. Aggregation of Positions

For the purpose of applying the position limits in the Table, all positions in accounts for which any person, by power of attorney or otherwise, directly or indirectly controls trading or holds a 10 percent or greater ownership or equity interest must be aggregated with the positions held and trading done by such person. For the purpose of determining the positions in accounts for which any person controls trading or holds a 10 percent or greater ownership or equity interest, positions or ownership or equity interests held by, and trading done or controlled by, two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by, or the trading were done or controlled by, a single person. Any person that, by power of attorney or otherwise, holds or controls the trading of positions in more than one account or pool with substantially identical trading strategies, must aggregate all such positions in accordance with the provisions of CFTC Regulation 150.4(a)(2).

559.E. Exemptions from Aggregation

Exemptions from aggregation in all products subject to Exchange position limits must comply with the provisions of CFTC Regulation 150.4 (b). Any person claiming an exemption from Exchange position limits under the provisions of CFTC Regulation 150.4(b)(1)(ii), (b)(2), (b)(3), (b)(4), or (b)(7) must provide a notice to the Market Regulation Department which sets forth 1) a description of the relevant circumstances that warrant disaggregation and 2) a statement by a senior officer or executive of the entity certifying that the conditions set forth in the applicable CFTC aggregation exemption provision have been met. Upon request by the Market Regulation Department, any person claiming an exemption from aggregation under this Section E. must provide any requested information that demonstrates the person meets the applicable requirements for the exemption. Market Regulation, in its sole discretion, may amend, suspend, terminate, or otherwise modify a person's exemption from aggregation for failure to comply with the provisions of this Section E. In the event of a material change to the information provided in any notice filed under this Section E., an updated or amended notice must be promptly filed with the Market Regulation Department detailing the material change.

559.F. Conditional Limit in NYMEX Last Day Financial Natural Gas Contracts

The Market Regulation Department may grant a Conditional limit in Last Day Financial Natural Gas contracts of up to the equivalent of ten thousand (10,000) NYMEX Physical Natural Gas Contracts (NG) during the period that position limits are applicable. Any participant seeking such exemption must agree: (1) not to hold a position in the NG contract during the last three days of trading; (2) provide the Exchange information on the complete book of all positions related to the Henry Hub; and (3) any other information /documentation required by the Exchange

559.G. Violations

Violations of position limits and approved exemption limits are subject to the provisions of Rule 562.

CME and CBOT

Rule 560. POSITION ACCOUNTABILITY

A person who owns or controls positions in contracts traded on the Exchange or cleared by the Clearing House in excess of reportable levels or subject to accountability levels shall keep records, including records of their activity in the underlying commodity and related derivative markets, and make such records available, upon request, to the Exchange.

Upon request by the Market Regulation Department, such person shall also provide information relating to the positions owned or controlled by that person including, but not limited to, the nature and size of the position, the trading strategy employed with respect to the position, and hedging information, if applicable.

For purposes of this rule, all positions in accounts for which a person, by power of attorney or otherwise, directly or indirectly holds positions or controls trading shall be included with the positions held by such person. Additionally, positions held by two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by a single person.

If the person from whom such records or information is requested fails to comply as directed, the Market Regulation

Department may order the reduction of such position, in addition to taking disciplinary action as a result of such failure.

A person who exceeds position accountability or position limit levels as a result of maintaining positions at more than one clearing firm shall be deemed to have waived confidentiality regarding their position and the identity of the clearing members at which the positions are maintained.

A person who holds or controls aggregate positions in excess of specified position accountability levels or in excess of position limits pursuant to an approved exemption shall be deemed to have consented, when so ordered by the Market Regulation Department, not to further increase the positions, to comply with any prospective limit which exceeds the size of the position owned or controlled, or to reduce any open position which exceeds position accountability or position limit levels. Any order to reduce an open position shall be issued by the Chief Regulatory Officer or their designee, if they determine in their sole discretion, that such action is necessary to maintain an orderly market.

A clearing member that carries positions for another person shall be responsible for taking reasonable and diligent actions to effect the timely compliance with any order issued pursuant to this rule upon notification of such order by the Market Regulation Department.

All positions must be initiated and liquidated in an orderly manner.

NYMEX/COMEX

Rule 560. POSITION ACCOUNTABILITY

A person who owns or controls positions in excess of reportable levels or where such Person otherwise holds substantial positions in contracts traded on the Exchange or cleared by the Clearing House shall keep records, including records of their activity in the underlying commodity and related derivative markets, and make such records available, upon request, to the Exchange.

Upon request by the Market Regulation Department, such person shall also provide information relating to the positions owned or controlled by that person including, but not limited to, the nature and size of the position, the trading strategy employed with respect to the position, and hedging information, if applicable.

For purposes of this rule, all positions in accounts for which a person, by power of attorney or otherwise, directly or indirectly holds positions or controls trading shall be included with the positions held by such person. Additionally, positions held by two or more persons acting pursuant to an expressed or implied agreement or understanding shall be treated the same as if the positions were held by a single person.

If the person from whom such records or information is requested fails to comply as directed, the Market Regulation Department may order the reduction of such position, in addition to taking disciplinary action as a result of such failure.

A person who exceeds position accountability or position limit levels as a result of maintaining positions at more than one clearing firm shall be deemed to have waived confidentiality regarding their position and the identity of the clearing members at which the positions are maintained.

A person who holds or controls aggregate positions in excess of specified position accountability levels or in excess of position limits pursuant to an approved exemption shall be deemed to have consented, when so ordered by the Market Regulation Department, not to further increase the positions, to comply with any prospective limit which exceeds the size of the position owned or controlled, or to reduce any open position which exceeds position accountability or position limit levels. Any order to reduce an open position shall be issued by the Chief Regulatory Officer or their designee, if they determine in their sole discretion, that such action is necessary to maintain an orderly market.

A clearing member that carries positions for another person shall be responsible for taking reasonable and diligent actions to effect the timely compliance with any order issued pursuant to this rule upon notification of such order by the Market Regulation Department.

All positions must be initiated and liquidated in an orderly manner.

CME, CBOT, and NYMEX/COMEX

Rule 562. POSITION LIMIT VIOLATIONS

Any positions, including positions established intraday, in excess of those permitted under the rules of the Exchange shall be deemed position limit violations.

If a position exceeds position limits as a result of an option assignment, the person who owns or controls such position shall be allowed one business day to liquidate the excess position without being considered in violation of the limits. Additionally, if, at the close of trading, a position that includes options exceeds position limits when evaluated using the delta factors as of that day's close of trading, but does not exceed the limits when evaluated using the previous day's delta factors, then the position shall not constitute a position limit violation.

A clearing member shall not be in violation of this rule if it carries positions for its customers in excess of the applicable position limits for such reasonable period of time as the firm may require to discover and liquidate the excess positions. For the purposes of this rule, a reasonable period of time shall generally not exceed one business day.

A customer who exceeds the position limits as a result of maintaining positions at more than one clearing member shall be deemed to have waived confidentiality regarding their positions and the identity of the clearing members at which they are maintained. A clearing member carrying such positions shall not be in violation of this rule if, upon notification by the Market Regulation Department, it liquidates its pro-rata share of the position in excess of the limits or otherwise ensures the customer is in compliance with the limits within a reasonable period of time. For purposes of this rule, a reasonable period of time shall generally not exceed one business day.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**CME Globex Pre-Open Guidance**
Rule References	**Various**
Advisory Date	**April 11, 2019**
Advisory Number	**CME Group RA1903-5**
Effective Date	**April 25, 2019**

Effective on trade date Thursday, April 25, 2019, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA1715-5 from October 18, 2017. This Advisory Notice provides additional regulatory guidance attendant to activity during the CME Globex electronic trading platform ("Globex") pre-open period.

Rule 573 ("Globex Opening") states that prior to the opening of each Globex session, Globex will provide an indicative opening price ("IOP") or prices. The IOP reflects the price between the buying and selling pressure at which the largest volume of trading can occur based on the Globex equilibrium price algorithm, taking into consideration all pending orders that could be executed on the Globex opening. The IOP is broadcast to all Globex users and to the CME Group market data/ticker feed. During the 30-second period prior to the opening (referred to as the "lockdown" or "no cancel" period), new orders may be entered, although no previously entered order may be modified or cancelled.
CME Group markets observe U.S. holidays with amended opening times and extended pre-open periods several times a year. The relevant schedules are accessible here.

This Advisory Notice and the accompanying Frequently Asked Questions ("FAQ") section provide a non-exhaustive list of order messaging practices during the pre-open period that violate or may be deemed to violate Exchange rules.

1. Disruptive Practices During the Pre-Open Period

Rule 575 ("Disruptive Practices Prohibited") requires that all orders be entered for the purpose of executing bona fide transactions and requires that all actionable and non-actionable messages be entered in good faith for legitimate purposes, including during the pre-open period. Pursuant to Rule 575, no person shall enter or cause to be entered an order with the intent, at the time of order entry, to cancel the order before execution or to modify the order to avoid execution. Rule 575 further provides that no person shall enter or cause to be entered orders with the intent to disrupt, or with reckless disregard for the adverse impact on, the orderly conduct of trading or the fair execution of transactions.

The entry, modification or cancellation of orders during the pre-open period for the purpose of manipulating the IOP, causing artificial fluctuations in the IOP or identifying liquidity in the order book violates Rule 575 and may be deemed to violate other Exchange rules. Further, the intentional or reckless entry of orders priced through the then existing IOP that cause a market disruption on the open may be deemed to violate Rule 575 or other Exchange rules.

2. Market-on-Open Orders

Globex does not support the entry of market-on-open ("MOO") orders. Accordingly, market participants may not place MOO orders for entry with brokers or other parties eligible to handle customer orders, and

no party may accept MOO orders. As such, brokers or other parties eligible to handle customer orders may not guarantee a fill to their customer at the opening price.

Information on eligible order types for entry into Globex may be found using the following link:

https://www.cmegroup.com/confluence/display/EPICSANDBOX/Order+Types+for+Futures+and+Options

Market participants wishing to place an order with a broker or other party eligible to handle customer orders prior to the time that Globex opens must either indicate a specific limit price for the order or place a DRT (disregard tape or not-held order) order. A DRT order gives the party handling the order complete discretion over price and time in execution of the order, including discretion to execute all, some or none of the order.
Any market participant entering orders or causing orders to be entered during the pre-open period at prices significantly above and/or below the displayed IOP (or best bid/offer) must be cognizant of the potential for such orders to cause aberrant price movement during the pre-open period. Market participants are reminded that if such aberrant price movement occurs, the activity may be deemed to violate Rule 575. Additionally, market participants must be capable of handling the financial obligations attendant to the full execution of their orders at the prices that are entered into Globex.

3. Orders Intended to Negate or Strictly Limit Market Risk

Opposing orders for accounts with the same or common beneficial ownership entered during the pre-open period which match upon the opening of the market that a market participant knew or should have known would match violate Rule 534 ("Wash Trades Prohibited"). Market participants should have a reasonable expectation that resting buy and sell orders may match when the market opens if buy orders are priced at or above the price of the market participant's resting sell orders or sell orders are priced at or below the price of the market participant's resting buy orders.

Market participants need not trade against themselves on the opening match to violate Rule 534. A purchase (sale) opposite a counterparty followed by a sale (purchase) at the same price opposite the same or different counterparties may be deemed an "indirect wash trade" in violation of Rule 534 if the orders were entered with the intent to negate or strictly limit market risk.
It is a violation of Rule 534 for a market participant to attempt to circumvent the "no cancel" period by entering an order that could trade opposite a pending order from the same market participant or a pending order from an account with the same or common beneficial ownership.

4. Automated Trading System Order Entry

Market participants are permitted to deploy an algorithmic or automated trading system ("ATS") during the pre-open period. Market participants must ensure the logic or other configurations of the ATS are suitable for deployment during the pre-open period.

Rule 432.W. requires parties to diligently supervise their employees and agents, including ATSs, in the conduct of their business relating to the Exchange. All market participants are expected to monitor their ATSs and prevent aberrant order messaging, which may be disruptive to the IOP.

5. Testing

Pursuant to Rule 575, market participants are prohibited from entering test orders in non-test products during the pre-open period for any reason.

Entering an order(s) in a non-test product without the intent to execute a bona fide transaction is prohibited under Rule 575.

CME Group offers test products to facilitate connectivity and messaging testing on CME Globex. For more information please visit: http://www.cmegroup.com/confluence/display/EPICSANDBOX/CME+Globex+Test+Products.

Questions regarding this Advisory Notice may be directed to the following individuals in Market Regulation:

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FAQ Related to Activity During the Globex Pre-Open Period

Q1: What factors does Market Regulation consider in assessing a potential violation of Rule 575 as it relates to activity during the pre-open period?

A1: In addition to the factors listed in the Market Regulation Advisory Notice on prohibited disruptive practices, Market Regulation considers the following non-exhaustive list of factors in assessing whether conduct during the pre-open period violates Rule 575:

- the percentage of orders/volume a market participant canceled during a particular pre-open period, or the cancellation percentage during multiple pre-open periods over a period of time;
- the cancellation percentage of a market participant's orders/volume during multiple pre-open periods over a period of time compared to such market participant's cancellation percentage of orders/volume during active trading hours;
- the size (quantity) of a market participant's orders during the pre-open period compared to the size (quantity) during active trading hours;
- impact on the IOP;
- order activity by a market participant in concurrent pre-open periods in related Exchange markets;
- whether a market participant entered crossed-market orders (see Q&A 2) during the pre-open period, whether the crossed-market orders remained in the order book at the market open; the timing of crossed-market order placement; the length of time the crossed-market orders remained in the order book; whether crossed-market orders were entered on both sides of the market; and
- the percentage of a market participant's orders entered during multiple pre-open periods that remained in the market at the market open.

Q2: What is considered a crossed-market order during the pre-open period?

A2: A crossed-market order is a bid entered at a price above the currently displayed IOP or best offer, or an offer entered at a price below the currently displayed IOP or best bid.

Q3: Is a market participant prohibited from cancelling orders during the pre-open period?

A3: No. Market participants are not prohibited from cancelling an order during the pre-open period if the order is cancelled for legitimate purposes, including but not limited to mitigating risk due to changing market conditions, a shift in market outlook, or a modification in trading strategy.

Q4: Is a market participant allowed to enter a crossed-market order during the pre-open period?

A4: Yes, there are several reasons a market participant may wish to enter a crossed-market order during the pre-open period including to secure queue position or increase the likelihood of getting filled at the market open. However, frequent modifications or cancellations of crossed-market orders may demonstrate that the market participant does not intend for the orders to be filled at the market open, which may be deemed to violate Rule 575 or other Exchange rules. Furthermore, if the crossed-market order entries, modifications, and/or cancellations cause undue fluctuations to the IOP, the conduct may be deemed to violate Rule 575 or other Exchange rules.

Q5: Is it a violation of Rule 534 if opposing orders entered during the Globex pre-open period for accounts with the same or common beneficial ownership match opposite each other once the market opens?

A5: Yes. Market participants should have a reasonable expectation that their resting buy and sell orders may match opposite each other when the market opens if the buy orders are priced at or above the price of their resting sell orders or the sell orders are priced at or below the price of their resting buy orders. If a market participant's buy and sell orders match opposite one another when the market opens as a result of orders entered during the Globex pre-open period that a party knew or should have known would match, the party has violated Rule 534.

Furthermore, market participants need not trade against themselves on the opening match to violate Rule 534. A purchase (sale) opposite a counterparty followed by a sale (purchase) at the same price opposite the same or different counterparties may be deemed an "indirect wash trade" in violation of Rule 534 if the orders were entered with the intent to negate or strictly limit market risk.

Q6: Is a market participant allowed to switch sides of the market when entering orders during the pre-open period?

A6: Yes, provided that all orders are entered for bona fide trading purposes. Market Regulation recognizes that market participants may change their trading strategy based on many factors, including changing market conditions and/or a shift in market outlook.

Q7: What is the appropriate order entry method during the pre-open period for a party wishing to increase the likelihood of being filled on the open?

A7: Crossed-market orders increase the likelihood of being filled on the market open. Market participants are reminded, however, that they must be willing and able to trade the full quantity of their orders at the prices entered on such orders. Additionally, market participants must be

cognizant that crossed-market orders may cause aberrant price movement during the pre-open period, particularly in instances where the order quantity is large relative to the market depth at the time of order entry. If an aberrant price movement occurs, the activity may be deemed to violate Rule 575.

Q8: May a market participant enter orders during the pre-open period in markets eligible for Trading at Settlement ("TAS"), Trading at Marker ("TAM"), Basis Trade at Index Close ("BTIC"), or Basis Trade at Cash Open ("TACO") pricing?

A8: Yes, however any market participant who initiates the entry of a TAS, TAM, BTIC, or TACO order prior to receipt of the security status message indicating that market has transitioned to the pre-open period will be subject to disciplinary action by a panel of the Business Conduct Committee, notwithstanding that the order may have been rejected by the CME Globex system.

Q9: Are automated trading systems allowed to operate during the pre-open period?

A9: Yes, market participants may utilize an automated trading system ("ATS") during any pre-open period. If an ATS is enabled during the pre-open period, the algorithm should contain logic to account for its unique characteristics, such as the recognition that trade matches do not occur until the market opens, in order to avoid causing undue fluctuations to the IOP.

Q10: Do orders entered during the pre-open period need to be entered at prices consistent with the contract's settlement price from the prior trading session?

A10: No, orders may be entered at any price level provided the order has been entered with an intent to trade and the order's price does not cause an undue fluctuation to the IOP.

Q11: How may market participants receive advance notifications regarding upcoming extended pre-open periods in observance of U.S. Holidays?

A11: Market participants may subscribe to receive advance e-mail notifications of upcoming holidays by selecting the "Globex Notices" checkbox in the CME Group Subscription Center via the following link: http://pages.cmegroup.com/subscription-center-sign-in.html

Examples of Prohibited Activity During the Pre-Open Period

- Scanning the Book for Hidden Orders: A market participant places a crossed-market buy order (i.e. an order to buy priced above the existing IOP or best offer) for the purpose of ascertaining whether there are stop or iceberg orders (i.e. non-displayed liquidity) on the sell side of the order book. Then, after learning the state of the sell side of the market, the market participant cancels that bid and places an order or orders to sell. The original buy order was non-bona fide, as its purpose was not to engage in a transaction in the market but to identify hidden liquidity on the opposite side of the market. Further, the market participant's intent at the time of order entry was to cancel the order prior to execution. This type of conduct violates Rule 575.

- Market Depth Testing: To determine the maximum quantity the market participant can purchase on the open at the then existing IOP, the market participant enters a series of crossed-market buy orders until one of the crossed-market buy orders causes the IOP to shift up. Having ascertained the maximum buy quantity that could be entered without shifting the IOP, the market participant cancels all buy orders. Typically, then, during the lockdown period, the market participant enters buy orders with quantities the participant believes, based on the previous non-bona fide activity, will not cause the IOP to shift. The original series of buy orders were non-bona fide, as their

purpose was not to engage in a transaction in the market but to identify the depth of the market. Further, the market participant's intent at the time of entering the orders was to cancel them prior to execution. This type of conduct violates Rule 575.

- Lockdown Circumvention, Negating Market Risk: Prior to the lockdown period, a market participant enters a crossed-market buy order. After the pre-open period transitions to the lockdown period, other market participants' activity causes the IOP to shift up. No longer wanting to buy at the new (higher) IOP and unable to cancel or modify their resting buy order, the market participant enters a crossed-market sell order to offset or "scratch" the original buy order. During the opening match, the market participant's buy and sell orders trade at the opening price. With the entry of the crossed-market offer, the market participant did not intend to take a bona fide market position and intended to negate market risk and price competition. This type of conduct violates Rule 534.

- IOP Manipulation: A market participant places large quantity orders at the beginning of the pre-opening period in an effort to artificially increase or decrease the IOP with the intent to attract other market participants. Once others join the market participant's bid or offer, the market participant cancels their orders shortly before the lockdown period. Consequently, those other market participants did not have an opportunity to react to the cancelled bids or offers prior to the open when their orders became executable.

MARKET REGULATION ADVISORY NOTICE

Exchange	**CME, CBOT, NYMEX & COMEX**
Subject	**Disruptive Practices Prohibited**
Rule References	**Rule 575**
Advisory Date	**July 19, 2021**
Advisory Number	**CME Group RA2107-5**
Effective Date	**August 2, 2021**

Effective on trade date Monday, August 2, 2021, and pending all relevant CFTC regulatory review periods, this Market Regulation Advisory Notice will supersede CME Group Market Regulation Advisory Notice RA2006-5 from July 27, 2020. It is being issued based on the following amendments:

- Codify expectations in Q&A 5 with respect to reasonable controls to prevent, detect, and mitigate the occurrence of errors.
- Codify pre-existing guidance in Q&A 11 with respect to the requirement that participants be prepared to, and capable of, handling the financial obligations and risk attendant to the full execution of their orders without disrupting the market.
- Additional explanation in Q&A 13 of factors that may be considered when determining whether the activity in question is disorderly.
- Clarifying amendment to Q&A 23 regarding the prohibition of purposeful submissions of intentionally corrupted or malformed data packets.
- Additional example of prohibited activity that violates Q&A 23 and Rule 575.C.2.

No other substantive changes have been made to this Advisory Notice.

Rule 575 and the accompanying Questions & Answers and examples in this Advisory Notice codify particular types of disruptive order entry and trading practices that the CME Group Exchanges find to be abusive to the orderly conduct of trading or the fair execution of transactions. Such practices have historically been prohibited by and prosecuted under other Exchange rules, including, but not limited to, Rules 432.T. ("to engage in dishonorable or uncommercial conduct"), 432.B.2. ("to engage in conduct or proceedings inconsistent with just and equitable principles of trade"), and 432.Q. ("to commit an act which is detrimental to the interest or welfare of the Exchange or to engage in any conduct which tends to impair the dignity or good name of the Exchange"). Other disruptive practices not covered by this Rule 575 may continue to be prosecuted under other Exchange rules including, but not limited to, 432.B.2, 432.Q and 432.T.

Among other disruptive practices, Rule 575 prohibits certain of the disruptive practices added to Section 4c(a) of the Commodity Exchange Act as subparagraph (5) by Section 747 of the Dodd-Frank Act. Subparagraph (5) provides:

> (5) DISRUPTIVE PRACTICES – It shall be unlawful for any person to engage in any trading, practice, or conduct on or subject to the rules of a registered entity that –
>
> (A) violates bids or offers;
>
> (B) demonstrates intentional or reckless disregard for the orderly execution of transactions during the closing period; or
>
> (C) is, is of the character of, or is commonly known to the trade as, "spoofing" (bidding or offering with the intent to cancel the bid or offer before execution).

On May 28, 2013, the Commodity Futures Trading Commission ("CFTC") made effective its "interpretive guidance and policy statement" respecting subparagraph (5). Rule 575 prohibits the type of activity identified by the Commission as "spoofing," including submitting or cancelling multiple bids or offers to create a misleading appearance of market depth and submitting or cancelling bids or offers with intent to create artificial price movements upwards or downwards. The Rule also prohibits "quote stuffing practices," which includes submitting or cancelling bids or offers to overload the quotation system of a registered entity, and submitting or cancelling bids or offers to delay another person's execution of trades. Rule 575 further encompasses subparagraph (5)'s prohibition against the disorderly execution of transactions during the closing period.

The text of Rule 575 appears below:

Text of Rule 575 – ("Disruptive Practices Prohibited")

All orders must be entered for the purpose of executing bona fide transactions. Additionally, all nonactionable messages must be entered in good faith for legitimate purposes.

A. No person shall enter or cause to be entered an order with the intent, at the time of order entry, to cancel the order before execution or to modify the order to avoid execution;

B. No person shall enter or cause to be entered an actionable or non-actionable message(s) with intent to mislead other market participants;

C.1. No person shall enter or cause to be entered an actionable or non-actionable message(s) with intent to overload or delay the systems of the Exchange or other market participants;

C.2. No person shall intentionally or recklessly submit or cause to be submitted an actionable or non-actionable message(s) that has the potential to disrupt the systems of the Exchange; and

D. No person shall enter or cause to be entered an actionable or non-actionable message(s) with intent to disrupt, or with reckless disregard for the adverse impact on, the orderly conduct of trading or the fair execution of transactions.

To the extent applicable, the provisions of this Rule apply to open outcry trading as well as electronic trading activity. Further, the provisions of this Rule apply to all market states, including the pre-opening period, the closing period and all trading sessions.

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FAQ Related to Rule 575
Disruptive Practices Prohibited

Q1: What factors may Market Regulation consider in assessing a potential violation of Rule 575?

A1: Market Regulation may consider a variety of factors in assessing whether conduct violates Rule 575, including, but not limited to:

- whether the market participant's intent was to induce others to trade when they otherwise would not;
- whether the market participant's intent was to affect a price rather than to change their position;
- whether the market participant's intent was to create misleading market conditions;
- market conditions in the impacted market(s) and related markets;
- the effect on other market participants;
- the market participant's historical pattern of activity;
- the market participant's order entry and cancellation activity;
- the size of the order(s) relative to market conditions at the time the order(s) was placed;
- the size of the order(s) relative to the market participant's position and/or capitalization;
- the number of orders;
- the ability of the market participant to manage the risk associated with the order(s) if fully executed;
- the duration for which the order(s) is exposed to the market;
- the duration between, and frequency of, non-actionable messages;
- the queue position or priority of the order in the order book;
- the prices of preceding and succeeding bids, offers, and trades;
- the change in the best offer price, best bid price, last sale price, or Indicative Opening Price ("IOP") that results from the entry of the order;
- the market participant's activity in related markets; and
- industry best practices regarding the design, testing, implementation, operation, change management, monitoring, and documentation of automated trading systems.

Q2: What does "misleading" mean in the context of Rule 575.B.?

A2: The language is intended to be a more specific statement of the general requirement that market participants are not permitted to act in violation of just and equitable principles of trade. This section of the Rule prohibits a market participant from entering orders or messages with the intent of creating the false impression of market depth or market interest. Market Regulation generally will find the requisite intent where the purpose of the participant's conduct was, for example, to induce another market participant to engage in market activity.

Q3: Is there a specific amount of time an order should be exposed to the market to demonstrate that it does not constitute a disruptive practice?

A3: Although the amount of time an order is exposed to the market may be a factor that is considered when determining whether the order constituted a disruptive trading practice, there is no prescribed safe harbor. Market Regulation will consider a variety of factors, including exposure time, to determine whether an order or orders constitute a disruptive practice.

Q4: Is it a violation of Rule 575 to modify or cancel an order once it has been entered?

A4: An order, entered with the intent to execute a bona fide transaction, that is subsequently modified or cancelled due to a perceived change in circumstances does not constitute a violation of Rule 575.

Q5: Will orders that are entered by mistake or error constitute a violation of Rule 575?

A5: An unintentional, accidental, or "fat-finger" order will not constitute a violation of Rule 575, but such activity may be violative of other Exchange rules, including, but not limited to, Rule 432.Q. ("Acts Detrimental to the Welfare of the Exchange"). Market participants are expected to take reasonable steps or otherwise have controls to prevent, detect, and mitigate the occurrence of errors or system anomalies, and their impact on the market. Failure to take reasonable steps to prevent, detect, and mitigate such errors, anomalies, or impacts may violate Rules 575.C.2., 575.D., 432.W. ("Failure to Supervise"), or other Exchange rules.

Q6: Does a partial fill of an order demonstrate that the order did not violate Rule 575?

A6: While execution of an order, in part or in full, may be one indication that an order was entered in good faith, an execution does not automatically cause the order to be considered compliant with Rule 575. Orders must be entered in an attempt to consummate a trade. A variety of factors may lead to a violative order ultimately achieving an execution. Market Regulation will consider a multitude of factors in assessing whether Rule 575 has been violated.

Q7: Under this rule, is a market participant prohibited from making a two-sided market with unequal quantities (e.g., 100 bid at 10 offered)?

A7: No. Market participants are not precluded from making unequal markets as long as the orders are entered for the purpose of executing bona fide transactions. If either (or both) order(s) are entered with prohibited intent, including recklessness, such activity will constitute a violation of Rule 575.

Q8: Are stop orders entered for purposes of protecting a position prohibited by Rule 575?

A8: Market participants may enter stop orders as a means of minimizing potential losses with the hope that the order will not be triggered. However, it must be the intent of the market participant that the order will be executed if the specified condition is met. Such an order entry is not prohibited by this Rule.

Q9: Is the use of iceberg orders considered misleading under Rule 575.B.?

A9: No. The use of iceberg orders, in and of itself, is not considered a violation of Rule 575. However, a violation may exist if an iceberg order is used as part of a scheme to mislead other participants, for example, if a market participant pre-positions an iceberg on the bid and then layers larger quantities on the offer to create artificial downward pressure that results in the iceberg being filled.

Q10: Is a market participant allowed to enter order(s) at various price levels throughout the order book in order to gain queue position, but subsequently cancel those orders as the market changes?

A10: It is understood that market participants may want to achieve queue position at certain price levels and given changing market conditions may wish to modify or cancel those orders. In the absence of other indicia that the orders were entered for disruptive or misleading purposes, or

with reckless disregard for the adverse impact on the orderly conduct of trading or the fair execution of transactions, they would not constitute a violation of Rule 575.

Q11: Is it prohibited to enter an order for a quantity larger than a market participant expects to trade in electronic markets subject to a pro-rata matching algorithm?

A11: Orders entered for the purpose of achieving an execution are permitted. Accordingly, orders entered into markets subject to a pro-rata matching algorithm that are intended to maximize execution of those orders are permitted. However, it is considered an act detrimental to the welfare of the Exchange and may be a violation of other Exchange rules for a market participant to enter an order without the ability to satisfy, by any means, the financial obligations attendant to the transaction that would result from full execution of the order. Participants should be prepared to, and capable of, handling the financial obligations and risk attendant to the full execution of their orders without disrupting the market. In no circumstance may a participant intentionally or recklessly disregard the orderliness of the market in offsetting the risk associated with a large fill event.

Q12: What are "actionable" and "non-actionable" messages in relation to Rule 575.B., C. and D.?

A12: Actionable messages are messages that can be accepted by another party or otherwise lead to the execution of a trade. An example of an actionable message is an order message. Non-actionable messages are those messages submitted to the Exchange that relate to a non-actionable event. Examples of non-actionable messages include Requests for Quotes, creation of User Defined Spreads (UDS) or User Defined Instruments (UDI), entry of orders in test products, administrative messages, and network packets that are incomplete, partial, corrupt, or otherwise unable to be processed by the Exchange.

Q13: How does Market Regulation define "orderly conduct of trading or the fair execution of transactions?"

A13: Whether a market participant intends to disrupt the orderly conduct of trading or the fair execution of transactions or demonstrates a reckless disregard for the orderly conduct of trading or the fair execution of transactions may be evaluated only in the context of the specific instrument, market conditions, and other circumstances present at the time in question. Some of the factors that may be considered in determining whether there was orderly conduct or the fair execution of transactions were described by the CFTC as follows: "[A]n orderly market may be characterized by, among other things, parameters such as a rational relationship between consecutive prices, a strong correlation between price changes and the volume of trades, levels of volatility that do not dramatically reduce liquidity, accurate relationships between the price of a derivative and the underlying such as a physical commodity or financial instrument, and reasonable spreads between contracts for near months and for remote months." Antidisruptive Practices Authority, 78 Fed. Reg. at 31,895-96. Additional factors that may be considered include, but are not limited to, the impact to other market participants' ability to trade, engage in price discovery, or manage risk. Volatility alone, however, will not be presumptively interpreted as disorderly or disruptive as market volatility can be consistent with markets performing their price discovery function.

Q14: Is a market participant precluded from entering orders that may be considered large for a particular market, and thus may have a potential impact on the market?

A14: The size of an order or cumulative orders may be deemed to violate Rule 575 if the entry results in disorderliness in the markets, including, but not limited to, price or volume aberrations. Market participants should further be aware that the size of an order may be deemed to violate Rule 575 if that order distorts the integrity of the settlement prices. Accordingly, market participants should be cognizant of the market characteristics of the products they trade and ensure that their order entry activity does not result in market disruptions. Exigent circumstances may be considered in

determining whether a violation of Rule 575 has occurred and, if so, what the appropriate sanction should be for such violation.

Q15: What is meant by "the closing period" in Rule 575?

A15: "Closing period" typically refers to the period during which transactions, bids, and offers are reviewed for purposes of informing settlement price determinations. The "closing period" may also refer to the period when various cash instruments close, commonly referred to as the "Cash Close."

Q16: What factors will Market Regulation consider in determining if an act was done with the prohibited intent or reckless disregard of the consequences?

A16: Proof of intent is not limited to instances in which a market participant admits its state of mind. Where the conduct was such that it more likely than not was intended to produce a prohibited disruptive consequence, intent may be found. Claims of ignorance, or lack of knowledge, are not acceptable defenses to intentional or reckless conduct. Recklessness has been commonly defined as conduct that "departs so far from the standards of ordinary care that it is very difficult to believe the actor was not aware of what he or she was doing." *See* Drexel Burnham Lambert, Inc. v. CFTC, 850 F.2d 742, 748 (D.C. Cir. 1988).

Q17: Are orders entered for the purpose of igniting momentum in the market prohibited by Rule 575?

A17: A "momentum ignition" strategy occurs when a market participant initiates a series of orders or trades in an attempt to ignite a price movement in that market or a related market.

This conduct may be deemed to violate Rule 575 if it is determined the intent was to disrupt the orderly conduct of trading or the fair execution of transactions, if the conduct was reckless, or if the conduct distorted the integrity of the determination of settlement prices. Further, this activity may violate Rule 575.A. if the momentum igniting orders were intended to be canceled before execution, or if the orders were intended to mislead others. If the conduct was intended to create artificially high or low prices, this may also constitute a violation of Rule 432.H.

Q18: Are "flipping" orders prohibited by Rule 575?

A18: Flipping is defined as the entry of orders or trades for the purpose of causing turns of the market and the creation of volatility and/or instability.

A "flip" order typically has two main characteristics. First, it is an aggressor order. Second, shortly before the entry of the order, the market participant cancels an order(s) on the opposite side of the market, typically at the same price as the aggressor order. The market participant, for example, has flipped from offering to bidding at the same price. Market Regulation recognizes there are many variables that can cause a market participant to change their perspective of the market. This Rule, therefore, does not prohibit a market participant from changing their bias from short (long) to long (short).

Flipping activity may, however, be disruptive to the marketplace. For example, repeated instances of a market participant entering flipping orders that are each large enough to turn the market (i.e., being of a sufficient quantity to sweep the entire quantity on the book at the particular price level and create a new best bid or best offer price with any remaining quantity from the aggressor flipping order) can be disruptive to the orderly conduct of trading or the fair execution of transactions. In considering whether this conduct violates Rule 575, Market Regulation would consider, among other factors:

- the impact on other market participants;

- price fluctuations;
- market conditions in the impacted market(s) and related markets;
- the participant's activity in related markets;
- whether the flip involved the cancellation of a large sized order(s) relative to the existing bid or offer depth; and
- whether repeated flipping turns the market back and forth (e.g., the first flip turns the market in favor of the offer (bid) and the second flip turns the market in favor of the bid (offer)).

Q19: Does Market Regulation consider cancelling an order via CME Group's Self-Match Prevention functionality or other self-match prevention technology indicative of an order being in violation of Rule 575?

A19: The means by which an order is cancelled, in and of itself, is not an indicator of whether an order violates Rule 575. The use of self-match prevention functionality in a manner that causes a disruption to the market may constitute a violation of Rule 575. Further, if the resting order that was cancelled was non-bona fide *ab initio*, it would be considered to have been entered in violation of Rule 575.

Q20: What type of pre-open activity is prohibited by Rule 575?

A20: Please see the CME Group Market Regulation Advisory Notice on order entry during the CME Globex pre-open period.

Q21: May orders be entered into CME Globex for the purpose of testing, such as to verify a connection to Globex or a data feed from Globex?

A21: CME Group offers test products in the production environment to facilitate connectivity and messaging testing on CME Globex. For more information please visit http://www.cmegroup.com/confluence/display/EPICSANDBOX/CME+Globex+Test+Products.

The entering of an order(s) in a non-test product without the intent to execute a bona fide transaction, including for the purpose of verifying connectivity or checking a data feed, is not permissible. The aforementioned prohibition does not preclude a market participant from entering a bona fide order into CME Globex that is intended to be executed and where such execution may also serve some other risk management purpose, such as verifying the flow of the executed trades through the firm's back-office systems.

Q22: Is the creation or execution of User Defined Spreads ("UDS") for the purposes of deceiving or disadvantaging other market participants a violation of Rule 575?

A22: Yes. Although the CME Globex system provides certain protections such as reasonability checks with respect to option deltas and the futures price on covered instruments, the UDS functionality requires users to exercise diligence and care in the creation of option spread instruments, including the creation of covered option strategies.

Market participants are reminded that knowingly creating and/or trading UDS instruments in a manner intended to deceive or unfairly disadvantage other market participants is considered a violation of Rule 575. Additionally, the Global Command Center may price adjust or cancel trades that are deemed to negatively impact the integrity of the market pursuant to the provisions of Rule 588 ("Trade Cancellations and Price Adjustments").

Q23: Is it a violation of Rule 575 to engage in a strategy that involves the purposeful submission of intentionally corrupted or malformed data packets to CME Globex?

A23: Yes. Purposefully submitting intentionally corrupted or malformed data packets has the potential to disrupt the systems of the Exchange. Market Regulation considers that any participant purposefully engaging in this practice as part of a trading strategy to have recklessly disregarded the potential to disrupt the systems of the Exchange in violation of Rule 575.C.2.

Q24: Are brokers and execution clerks expected to consider market conditions when executing an order on behalf of a customer or employer pursuant to their instructions?

A24: Yes. Brokers and execution clerks are considered market participants. The instructions of a customer or employer do not negate the obligation for brokers and execution clerks to comply with Rule 575.

Examples of Prohibited Activity

The following is a non-exhaustive list of various examples of conduct that may be found to violate Rule 575.

- A market participant enters one or more orders to generate selling or buying interest in a specific contract. By entering the orders, often in substantial size relative to the contracts' overall pending order volume, the market participant creates a misleading and artificial appearance of buy- or sell-side pressure. The market participant places these large orders at or near the best bid and offer prevailing in the market at the time. The market participant benefits from the market's reaction by either receiving an execution on an already resting order on the opposite side of the book from the larger order(s) or by obtaining an execution by entering an opposing side order subsequent to the market's reaction. Once the smaller orders are filled, the market participant cancels the large orders that had been designed to create the false appearance of market activity. Placing a bona fide order on one side of the market while entering order(s) on the other side of the market without intention to trade those orders violates Rule 575.

- A market participant places buy (or sell) orders that they intend to have executed, and then immediately enters numerous sell (or buy) orders for the purpose of attracting interest to the resting orders. The market participant placed these subsequent orders to induce, or trick, other market participants to execute against the initial, order. Immediately after the execution against the resting order, the market participant cancels the open orders.

- A market participant enters one or more orders in a particular market (Market A) to identify algorithmic activity in a related market (Market B). Knowing how the algorithm will react to order activity in Market A, the participant first enters an order or orders in Market B that they anticipate would be filled opposite the algorithm when ignited. The participant then enters an order or orders in Market A for the purpose of igniting the algorithm and creating momentum in Market B. This results in the participant's order(s) in Market B being filled opposite the algorithm. This conduct violates Rule 575.A., as the orders in Market A were not intended to be executed, and Rule 575.B., as the orders in Market A were intended to mislead participants in related markets. If the conduct resulted in a disruption to the orderly execution of transactions, it may also violate Rule 575.D.

- A market participant enters a large number of orders and/or cancellations/updates for the purpose of overloading the quotation systems of other market participants with excessive market data messages to create "information arbitrage."

- A market participant enters order(s) or other messages for the purpose of creating latencies in the market or in information dissemination by the Exchanges for the purpose of disrupting the orderly functioning of the market.

- A market participant enters a large aggressor buy (sell) order at the best offer (bid) price, trading opposite the resting sell (buy) orders in the book, which results in the remainder of the original aggressor order resting first in the queue at the new best bid (offer). As the market participant anticipated and intended, other participants join their best bid (offer) behind them in the queue. The market participant then enters a large aggressor sell (buy) order into their now resting buy (sell) order at the top of the book. The market participant's use of CME Group's Self-Match Prevention functionality or other wash blocking functionality cancels the market participant's resting buy (sell) order, such that market participant's aggressor sell (buy) order then trades opposite the orders that joined and were behind the market participant's best bid (offer) in the book.

- A market participant engages in a trading strategy where their trading system is designed to purposefully corrupt data sent across one or more physical connections to the Exchange. For example, prior to the occurrence of an event or signal, the participant's trading system begins transmitting to the Exchange data necessary for an order message (e.g. Ethernet frame; Internet Protocol (IP) packet; Transmission Control Protocol (TCP) packet; etc.). The trading system is designed so that if the event or signal does not occur as expected, the trading system will corrupt the partially transmitted data, for instance by invalidating the Frame Check Sequence (FCS) checksum causing the packet or Ethernet frame to be dropped by a network switch or receiving device at the logical or physical entry point to CME Globex. If the event does occur as expected, the trading system will complete the partially transmitted data so that an order message from the trading system is able to reach the Exchange trading platform. The practice of purposefully corrupting data packets submitted to the Exchange has the potential to disrupt the systems of the exchange and may violate Rule 575.C.2.

- A market participant engages in a trading strategy where their trading system is designed to purposefully send to the Exchange untradeable orders or orders that have no reasonable probability of trading. For example, prior to the occurrence of an event or signal, the participant's trading system begins transmitting to the Exchange data necessary for an order message (e.g. Ethernet frame; TCP packet; etc.). The trading system is designed so that if the event or signal does not occur as expected, the trading system will complete the partially transmitted data and successfully submit an order message to the Exchange. However, because the event or signal did not occur as expected, the trading system is designed to render the completed order message untradeable or improbable of trading. This may be accomplished, for example, by submitting the order message as a Fill and Kill or Fill or Kill order type with a price or quantity that causes the order to immediately be cancelled by the trading platform. This may also be accomplished, for example, by submitting the order message at an off-market price, deep in the order book, and intending to cancel that order prior to execution. The practice of purposefully sending untradeable orders or orders that have no reasonable probability of trading may violate Rule 575.C.2. Further, it is a violation of Rule 575.A. if the participant intends, at the time of order entry, to cancel the order prior to execution.

- A market participant engages in a trading strategy where their trading system is designed to purposefully submit malformed data across one or more physical connections to the Exchange. For example, based on information received, the participant's trading system begins constructing an order message (e.g., an Ethernet Frame, TCP or IP packet, etc.). The trading system is designed so that if further information is received during construction that negates the desire or need to trade the order being constructed, the trading system will stop construction and submit the incomplete data to the Exchange. Because the incomplete data (e.g., a TCP/IP packet missing required TCP or IP fields such as Sequence Number or Destination Port) cannot be

properly processed by a network switch or receiving device at the logical or physical entry point to CME Globex, the receiving device will discard the data. If no further information is received by the trading system during construction that would negate the desire or need to trade the order, the trading system will complete construction of, and submit, the data so that an order message from the trading system is able to reach the Exchange trading platform. The practice of submitting to the Exchange purposefully incomplete or malformed data packets has the potential to disrupt the systems of the Exchange and may violate Rule 575.C.2.

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit C

EXHIBIT C

Exhibit Request:

As of the latest date practicable within one (1) month of the date Form 1-N is filed, for each subsidiary or affiliate of the filing exchange that will be involved in the trading of security futures products, and for any entity with whom the exchange has a contractual or other agreement relating to the operation of an electronic trading system to be used to effect transactions in security futures products on the exchange ("System"), provide the following information:

1. Name and address of organization.
2. Form of organization (e.g., association, corporation, partnership, etc.).
3. Name of state and statute citation under which organized. Date of incorporation in present form.
4. Brief description of nature and extent of affiliation.
5. Brief description of business or functions. Description should include responsibilities with respect to operation of the System and/or execution, reporting, clearance (including the controls that will be implemented to ensure the safety of held funds or securities), or settlement of transactions in connection with operation of the System.
6. A copy of the constitution.
7. A copy of the articles of incorporation or association including all amendments.
8. A copy of existing by-laws or corresponding rules or instruments.
9. The name and title of the present officers, governors, or persons performing similar functions.
10. An indication of whether such business or organization ceased to be associated with the Security Futures Product Exchange during the previous year, and a brief statement of the reasons for termination of the association.

Response:

Not Applicable. No subsidiaries or affiliates of Chicago Mercantile Exchange Inc. are involved in the trading of security futures products at this time.

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit D

EXHIBIT D

Exhibit Request:

Describe the manner of operation of the System involving trading of security futures products. This description should include the following:

1. The means of access to the System.
2. Procedures governing entry and display of quotations and orders in the System.
3. Procedures governing the execution, reporting, clearance, and settlement of transactions in connection with the System.
4. Proposed fees.
5. Procedures for ensuring compliance with System usage guidelines.
6. The hours of operation of the System, and the date on which the exchange intends to commence operation of the System.
7. Attach a copy of the users' manual.

Response:

The Exchange will list security futures products exclusively on its electronic trading platform, CME Globex, described generally below. CME Globex is an open access marketplace that allows market participants to directly enter their own trades and participate in the trading process, including viewing the book of orders and real-time price data. To access CME Globex, customers must have a CME Group clearing firm relationship, CME Group-certified trading application and connectivity to CME Globex. Responses to items 1 – 6 are set forth below. For item 7, a copy of the Globex Reference Guide is provided as Exhibit D-1.

1. *The means of access to the system.*

Customers worldwide have access to CME Globex. The range of connectivity options include Internet connections, direct connections and several telecommunication hubs that provide reduced connectivity costs, increased accessibility and fast efficient trading.

The following outlines the process related to direct and indirect access to CME Globex, as well as information related to gaining membership with CME. Membership is not necessary to trade on CME but generally provides members with reduced trading fees.

Membership

CME offers "Corporate Membership" and "Individual Membership". To trade specific products at member rates, a person or entity must be a member of the exchange on which they trade. General rules governing CME memberships are set forth in Chapter 1 of the Rulebook.

Individual Membership allows a person to trade specific products at reduced rates and lower fees. CME offers different divisions of membership. Membership in each division enables the member to trade only a subset of products on each exchange at discounted rates. Details regarding individual membership at CME are set out at Individual Membership (cmegroup.com). New individual members are reviewed by the Concierge Team which conducts a background and credit check.

Corporate Memberships enable entities to receive preferential fees and performance bond rates on their proprietary trading pursuant to applicable Exchange Rules and law. Entities must own or lease a specified number of Individual Memberships to be eligible for Corporate Membership. The types and commensurate holding requirements for corporate memberships appear in Rule 106 of the Exchange Rulebook. Further information regarding Corporate Membership at CME is available at Corporate Membership (cmegroup.com). New applicants for corporate membership must submit requested documentation and undergo a thorough review and market regulation check by CME Group's Financial and Regulatory Surveillance Department ("**FRS**") (as a prerequisite for approval). Member firms are subject to certain ongoing reporting obligations pursuant to Exchange Rule 130.

Direct Access

Membership at CME is not synonymous with direct access. Members seeking access to Globex directly must meet a separate set of requirements. In order to obtain direct access to Globex, a market participant must complete a Customer Connection Agreement ("**CCA**") and Schedule 2. These agreements are available at CMEGlobexConnectionAgrmt.pdf (cmegroup.com) and CMEGlobexSch2AccessRequest.pdf (cmegroup.com).

Schedule 2 requests detailed information addressing how the participant intends to connect to Globex. Conversely, direct access to trading on CME, including through Globex, does not require Membership.

A market participant may execute an agreement for direct connectivity to Globex and execute trades directly thereon. CME Group offers test and production environments and a variety of connectivity options for both environments, each with different associated fees. Current connectivity options for test connections are available at Test Connectivity Options (cmegroup.com), and current connectivity options for production connections are available at Production Connectivity Options (cmegroup.com).

Customers with direct connections to Globex may utilize their own proprietary front-end systems, a CME-provided solution, or a third-party Independent Software Vendor. All applications used to connect to CME Globex must be certified. Generally speaking, to be certified, an application must properly perform certain functions such as entering, cancelling, and modifying an order. Applicants are further required to submit a sample audit trail that is approved by Market Regulation. Further information regarding connecting to Globex is available at Connect to CME Globex (cmegroup.com).

All connections to the CME Globex system, including direct connections, must be guaranteed by a Clearing Member that assumes responsibility for all activity through the connection. *See Exchange Rule 574*. There are no specific minimum capital requirements for direct connections (or corporate members) because the Clearing Member guarantees trades to CME Clearing. Therefore, the clearing member is at risk when its customer defaults. Clearing firms, as guarantors, have incentive to ensure the competence, integrity, and authority of system users through conducting their own due diligence and applying credit controls for each customer. At the CME Group level, clearing house risk examinations review clearing member credit control levels and procedures.

In addition, Exchange Rule 418 provides that any person initiating or executing a transaction on or subject to the rules of the respective Exchange, directly or through an intermediary, consents to the jurisdiction of the exchange and agrees to be bound by its rules.

2. *Procedures governing entry and display of quotations and orders in the System.*

A range of order types are permitted, including Limit, Market Order with Protection, Stop Limit, Stop Order with Protection, Request for Cross (RFC), and Mass Quote. All of these order types are described in the Globex Reference Guide included in this Exhibit D, and which is available on the Exchange's website at https://www.cmegroup.com/globex/files/GlobexRefGd.pdf.

Front-end system vendors may offer additional functionality in their applications.

Rule 576 requires that each order entered into CME Globex include the submission of an operator ID, also referred to as the "Tag 50 ID" or "User ID", which is unique to the party who entered the order. For orders entered manually, the Tag 50 ID must be unique to the individual entering the order into CME Globex. For orders entered by an automated trading system ("ATS"), the Tag 50 ID must be unique to the person, or the identified team of persons on the same shift, who are responsible for the operation of the ATS. All Tag 50 IDs must be unique at the level of the clearing member firm.
Clearing member firms must ensure that:

- all clients executing through the clearing firm, including those clients with direct connections to CME Globex, are fully aware of the Tag 50 ID submission requirements;
- each Tag 50 ID is unique at the clearing member firm;
- the correct Tag 50 ID is submitted on each order entered into CME Globex and accurately transmitted to the clearing member firm and to the exchanges; and
- where required, Tag 50 IDs are appropriately and accurately registered in the Exchange Fee System.

Failure to comply with the requirements of Rule 576 will result in disciplinary action.

CME employs a number of risk controls, with respect to price and volume thresholds, and has measures to monitor and mitigate the risks associated with electronic trading. More

information on these risk controls can be found here: https://www.cmegroup.com/globex/trade-on-cme-globex/risk-management-tools.html.

As to pre-trade information, the order book displays many levels of bids and offers at all times. As to post-trade information, CME publishes and makes available to the public a host of price information on its website, including both historical prices and the current day's prices. Delayed quotes for all products are available at no charge on the CME Group website. The free quotes are delayed by at least 10 minutes. In addition, real time quotes for all products are available to the public for a fee. This information can be purchased directly from CME Group or from a third-party vendor.

CME Group price quotation information is available from major news wires, newspapers and financial information service providers, and in streaming format over the internet directly to the general public.

3. *Procedures governing the execution, reporting, clearance, and settlement of transactions in connection with the System.*

Globex matches bids and offers pursuant to pre-defined algorithms that are specific to the product being traded. These algorithms include price and time priority and price and pro-rata priority. There are a number of possible variations of pro-rata priority. These algorithms are described in further detail on the CME Client Systems Wiki.

The Exchange passes trade details to the clearing corporation for settlement. Clearing is the activity of determining obligations, after which the obligations are discharged by settlement prior to the next trading session.

All trades executed on CME are cleared by CME Clearing, which is also housed in CME Inc. CME Clearing is one of the largest central counterparty clearing services in the world and utilizes a fully automated and integrated electronic system to clear trades executed on CME (resulting in their novation and guarantee), to settle such trades, and to facilitate management of risks of open positions resulting from such trades.

Only Clearing Members have direct access to CME's clearing systems. All trades cleared at CME Clearing are guaranteed by a Clearing Member, which assumes full financial responsibility for all cleared trades—whether proprietary or on behalf of customers. A Clearing Member conducting customer business is responsible for managing the risk of its customers pursuant to its required risk management program, applicable CFTC regulations and exchange rules. The clearing house in turn manages the risk of its Clearing Members in accordance with its rules and procedures. CME Clearing performs its risk management function independently from the commercial and business divisions of CME and is under separate management.

Per Exchange Rule 574, all Exchange market participants are required to be guaranteed by an Exchange clearing member. Relevant rules regarding Exchange and Exchange Clearing Members' relationships with CME Clearing are available in Rulebook Chapters 8 and 9.

Daily settlement prices are determined for each product trading on CME. The method of determining settlement price depends on the product group, level of activity and liquidity during the defined closing time period, and trading venue(s) used to derive the settlement. The procedures generally available for use in determining daily settlement prices are set forth in Exchange Rule 813 (Daily Settlement Price). Specific daily settlement procedures for each product group are available at CME Group Daily Settlement Procedures (cmegroup.com).

Clearing members or their customers must settle their exposure for a settlement cycle with the clearing house based on the settlement price for that cycle. Procedures for settlement with the clearing house following each settlement cycle are addressed in Exchange Rule 814 (Settlement Variation and Option Value). Further, certain products have procedures for establishing a final settlement price distinct from establishing a daily settlement price for the product on the last day of trading. Such products are identified in the product chapters of the Exchange rulebooks, and generally procedures addressing final settlement price are available in Exchange Rule 812 (Final Settlement Price).

4. *Proposed fees.*

Current fees for existing products are set forth in the Exchange's fee schedule, as periodically amended. The Exchange has not yet determined whether any different transaction fees will apply specifically to security futures products.

5. *Procedures for ensuring compliance with System usage guidelines.*

Exchange staff conducts routine surveillance for potential violations of the system usage guidelines contained in CME Rules and Regulations. CME Rule 418 states as follows:

> Any Person initiating or executing a transaction on or subject to the Rules of the Exchange directly or through an intermediary, and any Person for whose benefit such a transaction has been initiated or executed, expressly consents to the jurisdiction of the Exchange and agrees to be bound by and comply with the Rules of the Exchange in relation to such transactions, including, but not limited to, rules requiring cooperation and participation in investigatory and disciplinary processes. Any futures commission merchant, introducing broker, associated person, or foreign Person performing a similar role that charges a commission or fee in connection with transactions on or subject to the Rules of the Exchange also expressly consents to the Exchange's jurisdiction.

The Board of Directors of CME has appointed officers and created committees to which it has delegated responsibility for the investigation, hearing, and imposition of penalties for violations of the Rules. *See Exchange Rule 400*. Ultimately, under Exchange Rule 401, it is the duty of the Chief Regulatory Officer to enforce the Exchange Rules with the assistance of the Market Regulation Department, part of the Legal and Regulatory Division of CME Group, to conduct investigations of rule violations and market conditions.

The Chief Regulatory Officer has the authority to inspect the books and records of all parties subject to the jurisdiction of CME and may require any party to appear before him or her and produce their books and records to answer questions regarding possible violations of the Exchange Rules. Market Regulation conducts contract surveillance, audit trail supervision and trade practice surveillance programs which are designed to ensure that CME's markets are fair, orderly and transparent. The contract surveillance programs are designed to ensure that prices are not distorted and that contracts expire in an orderly manner. The integrity of the data input into the audit trail system of CME is maintained through Market Regulation's Data Investigations function. In turn, the trade practice surveillance programs rely upon, among other things, the audit trail to conduct regular surveillance, to investigate customer and member complaints, and to detect and deter trade practice abuses.

Contract Surveillance

Each day member firms are required to report the position of any account that is equal to or greater than the reportable position levels established by CME for each contract. Market Regulation staff monitor these positions through the Large Trader Reporting System. Market Regulation staff further monitor conditions in each futures market and the related cash market for indications of possible congestion or other market situations that have the potential to distort prices or otherwise impact the orderly expiration of a contract.

Audit Trail

CME maintains an audit trail for every transaction executed on the exchanges. Included in the array of audit trail information captured for each transaction are, among other things, the order entry time, execution time, account identification, parties to the transaction and customer type indicator. CME Globex provides detailed information on all order and trade activity to a thousandth of a second. Market Regulation staff conduct regular reviews of individuals and firms to ensure the integrity of the data input into these audit trail systems.

Trade Practice Surveillance

In addition to thoroughly investigating any complaints, Market Regulation routinely conducts internal surveillance of the trading activity in all CME markets. Market Regulation maintains a variety of surveillance systems to detect trading abuses.

Investigation and Enforcement

Market Regulation utilizes a number of different reference reports, exception reports, and databases to conduct a review of trading activities and isolate suspicious circumstances for further investigative review, and each Exchange's rules provide for means of enforcement of the rules and protection of the markets.

The Chief Regulatory Officer, pursuant to Exchange Rule 406, receives and reviews investigation reports from Market Regulation. The Chief Regulatory Officer is

empowered to determine whether there is a reasonable basis to charge a rule violation and is responsible for the preparation of charges. The Business Conduct Committee established by Exchange Rule 402 has jurisdiction over the conduct of, and enforcement of rules relating to trading practices, sales practices, trading conduct and ethics of members and others with the power to conduct hearings and investigations. The Business Conduct Committee may conduct hearings or investigations on its own initiative or by reference from staff, Market Regulation, the Chief Regulatory Officer or any other committee or division of the CMEG Exchanges. The Business Conduct Committee also has emergency powers pursuant to the Exchange Rules. *See Exchange Rule 402*.[1]

6. *The hours of operation of the System, and the date on which the exchange intends to commence operation of the System.*

The Exchange determines specific CME Globex trading hours on a product-by-product basis. The hours of trading for security futures products have not yet been determined.

7. *Attach a copy of the users' manual.*

A copy of the current CME Globex Reference Guide, which is attached, may also be viewed at https://www.cmegroup.com/globex/files/GlobexRefGd.pdf. The Reference Guide describes the functionality available to traders but is not designed to be a user guide. For specific operating instructions, traders are directed to refer to the reference documentation of their Independent Software Vendors (ISVs) or other front-end trading application.

For further information please see the CME Group Client Systems Wiki website at: https://cmegroupclientsite.atlassian.net/wiki/spaces/EPICSANDBOX/pages/46727905/CME+Globex.

[1] The CME Clearing House Risk Committee is charged with providing oversight on major risk management issues and financial safeguards, overseeing financial surveillance activities of the Audit Department, adopting regulations regarding qualification for admission to membership in the Clearing House, and conducting investigations and hearings on those matters. *See Exchange Rule 403*.

Exhibit D-1

CME Group

CME GLOBEX REFERENCE GUIDE

The CME Globex electronic trading platform provides trading opportunities on the world's most diverse array of futures and options on futures products to customers around the world nearly 24 hours a day.

As the world's leading and most diverse derivatives marketplace, CME Group (www.cmegroup.com) is where the world comes to manage risk. CME Group exchanges offer the widest range of global benchmark products across all major asset classes, including futures and options based on interest rates, equity indexes, foreign exchange, energy, agricultural commodities, metals, weather and real estate. CME Group brings buyers and sellers together through its CME Globex electronic trading platform and its trading facilities in New York and Chicago. CME Group also operates CME Clearing, one of the largest central counterparty clearing services in the world, which provides clearing and settlement services for exchange-traded contracts, as well as for over-the-counter derivatives transactions through CME ClearPort.

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ELECTRONIC TRADING AT CME GROUP

GLOBAL ACCESS TO ALL YOUR MAJOR ASSET CLASSES FROM A SINGLE PLATFORM

The CME Globex platform was the first—and remains among the fastest—global electronic trading system for futures and options. Through its advanced functionality, high-reliability and global connectivity, it is now the world's premier marketplace for derivatives trading. CME Globex gives you access to the broadest array of futures and options products available on any exchange, virtually around the clock, from anywhere in the world.

CME Group electronic markets are among the most liquid in the world, enabling customers to choose from a wide range of products in thousands of possible expirations and spreads. In addition to a single point of connection, customers who trade CME, CBOT, NYMEX and COMEX futures and options enjoy streamlined development efforts, a single source for customer support and more efficient access to real-time market data.

The platform is continuously enhanced to serve customers with high-speed, high-volume capacity, improved options capabilities and a range of new products. Functionality and capacity continue to grow dramatically to accommodate demand.

Benefits include:

Performance and speed

Trades on CME Globex are executed and confirmed to the customer with millisecond precision. CME Group is constantly working to reduce processing time—the platform continues to handle significantly more volume at a significantly faster pace. Our average daily order volume continues to increase, while the response time for trades continues to decrease.

Diverse, innovative products

CME Globex is the first derivatives platform to offer global access to all major asset classes—interest rates, equity indexes, FX, agriculture, energy, metals, weather and real estate. Customers can trade a range of global benchmark futures and options, including our flagship Eurodollar and E-mini S&P 500 contracts, benchmark metals and energy products, and highly innovative alternative investment products such as weather and real estate futures. Additionally, through partnerships with exchanges like the Brazilian Exchange BM&FBOVESPA, Bursa Malaysia (BMD), the Dubai Mercantile Exchange (DME), the Korea Exchange (KRX), the Minneapolis Grain Exchange (MGEX), and CME Europe Ltd, CME Globex gives you simple and easy access to market exposure around the world.

Open access and direct participation

The platform is an open access marketplace that allows customers to participate directly in the trading process, view the book of orders and prices for CME Group products and enter their own orders. Anyone who has an account with a Futures Commission Merchant (FCM) or Introducing Broker (IB), who in turn has a CME Clearing guarantee, can trade on the platform.

Access the CME Globex platform from nearly 150 countries and foreign territories through a range of connectivity options.

Our electronic trading platform offers customers:

- Streamlined development efforts
- Single source for production customer support
- Access to free risk management tools
- More efficient access to real-time market data
- 10-deep futures and 3-deep options for most markets
- High-speed, high-volume capacity
- Improved options capabilities and a range of new products
- Access to listed products traded on, Bursa Malaysia Derivatives Berhad (BMD), the Dubai Mercantile Exchange (DME), the Korean Exchange (KRX), and the Minneapolis Grain Exchange (MGEX)

Connectivity Options

Customers worldwide have access to the platform from nearly 150 countries and foreign territories, with new connections being added all the time. The range of connectivity options include Internet connections, direct connections and several telecommunication hubs that provide reduced connectivity costs, increased accessibility and fast efficient trading. Our telecommunication hubs are located in Hong Kong, London, Seoul, Singapore, and Tokyo.

Fairness, transparency, anonymity

CME Group electronic markets provide fair and equal trading opportunity for all participants. Individual retail traders, small businesses and large institutions alike see and have access to the same prices. The anonymity of traders and firms is protected electronically in all bids, offers and trades.

Market integrity

CME Clearing, the largest derivatives clearing house in the world, guarantees all contracts traded on the CME Globex platform and ensures that all traders honor their performance obligations. The CME Global Command Center (GCC) monitors trading activity and system performance around the clock to assure the orderly functioning of CME Group electronic markets.

Learn more about the connectivity options and benefits delivered by the CME Globex platform at cmegroup.com/globex.

PRODUCT OVERVIEW – WHAT'S ACCESSIBLE ON CME GLOBEX

The CME Globex platform brings diverse product solutions to customers around the world nearly 24 hours a day. These products address the business and risk management objectives of customers which are as varied as our products.

To view a complete list of CME Group products available on the CME Globex platform as well as contract codes, up-to-date specifications and expiration dates for all CME Group products, visit cmegroup.com.

Click on the product names below to go to a description for that product.

- CME Group Interest Rate Products
- CME Group Energy Products
- CME Group Agricultural Products
- CME Group Equity Indexes
- CME Group Metals Products
- CME Group FX Products

CME Group Interest Rate Products

CME Group offers the world's deepest centralized pool of interest rates liquidity, providing traders with a safe, efficient means for managing interest rate risk across the entire U.S. dollar-denominated yield curve. Trade futures and options on the most widely followed global benchmarks, including Eurodollars, U.S. Treasuries, 30-Day Fed Funds, SOFR and SONIA. Plus, benefit from portfolio margining with our market-leading 24 currencies of cleared Interest Rate Swaps (IRS). For more information, visit cmegroup.com/ir.

CME Group Equity Indexes

CME Group is the leading equity index derivatives marketplace, offering futures and options on key benchmark indexes that cover the spectrum of small-, mid- and large-cap indexes in the United States, Europe and Asia.

CME Group FX Products

CME Group offers the world's largest regulated FX marketplace and one of the top two FX platforms with over $125 billion in daily liquidity. We offer transparent pricing in a regulated centralized marketplace that provides all participants equal access to 56 futures contracts and 31 options contracts based on 20 major world and emerging market currencies. Trading FX at CME Group gives you effective and efficient investment and risk management opportunities and unprecedented access to a global array of market participants – including banks, hedge funds, proprietary trading firms and active individual traders. Additionally, we continue to roll-out comprehensive and flexible clearing services for OTC FX trades through CME ClearPort – an open-access, platform agnostic, post-execution clearing solution.

CME Group Agricultural Products

CME Group offers the widest range of agricultural futures and options available on any exchange. Our agricultural contracts include grains, oilseeds, livestock, dairy, lumber, fertilizer and other products. We serve agricultural producers, commercial firms, and entities seeking risk management and hedging tools, alongside asset managers, hedge funds, and liquidity providers who seek investment opportunities.

View our agricultural contracts and specifications at cmegroup.com/agriculture.

CME Group Metals Products

CME Group offers a full range of precious, base and ferrous contracts, including gold, silver, platinum, palladium, copper, steel and aluminum futures and options. We also offer smaller size contracts for gold (miNY 50 oz.), (E-micro 10 oz.), silver (E-mini 1,000 oz), (miNY 2,500 oz.) and copper (E-mini 12,500 lbs.). Additionally, we offer clearing services of OTC London Gold spot and forwards and Iron Ore Swap futures through CME ClearPort.

View our metals contracts and specifications at cmegroup.com/metals.

CME Group Energy Products

CME Group offers the most extensive and liquid energy marketplace in the world. We offer global benchmarks WTI crude oil and Henry Hub natural gas as well as gasoline, heating oil, electricity, and weather products. Our benchmarks set the price for energy resources worldwide. From the world's largest industrial companies to financial institutions, our diverse universe of participants trade on CME Globex, through CME ClearPort. Building on the legacy of NYMEX, CME Group is the world's leading energy marketplace.

View our energy contracts and specifications at cmegroup.com/energy.

ACCESSING THE CME GLOBEX PLATFORM

AN OPEN ARCHITECTURE THAT EASILY ACCOMMODATES CHANGING MARKETS, NEW CUSTOMERS AND NEW PRODUCTS

The open architecture of the CME Globex platform provides a wide range of access solutions and extensive functionality. The platform readily accommodates changing markets, new customers and new products. In addition to the trade matching system, components of the platform include trading applications, an order entry interface, a market data dissemination system and order risk management tools. These components all work together seamlessly to provide virtually instantaneous market visibility and trading.

A Wide Range of Trading Solutions

Traders may develop a proprietary front-end application or select from a variety of certified applications to execute electronic orders and receive market data directly. These applications are available from CME Group, FCMs, IBs and Independent Software Vendors (ISVs), and vary in the types of functionality supported.

Learn more about front-end trading solutions at cmegroup.com/tradingapplications.

CME Group Solutions

CME Direct

CME Direct is a highly-configurable trading front-end system that allows customers to directly access CME Group markets. CME Direct's integrated environment allows you to trade futures and options, enter blocks and fulfill reporting requirements, all on one screen. The platform is fast and robust, with click-optimized options strategy builders, rapid order entry tickets, real-time block and RFQ feeds and real-time streaming quotes, to help you make the most of your trading front-end.

Key Functions:

- Online trading of CME Group futures, including all NYMEX benchmarks
- Electronic trading of OTC markets, supported by selected, independent brokers
- Support for hybrid, broker-assisted trading combines the convenience of online execution with the benefits of voice brokerage
- Fully customizable instant messenger platform, CME Direct Messenger for your trading and communication needs
- Available globally, regionally supported

For more information please visit cmegroup.com/direct.

The CME Globex Order Routing Interface: iLink

iLink provides direct access to all CME Globex markets and supports all the enhanced trading functionality available on the platform. Based on the industry-standard FIX 4.X protocol, it readily supports customized trading systems.

Learn more about iLink at cmegroup.com/ilink.

Market Data Platform (MDP 3.0)

Market Data Platform (MDP) 3.0, a low latency and direct data access solution designed to improve customers' ability to process and act on real-time price information.

MDP 3.0 includes:

- Simple Binary Encoding (SBE)
- FIX 5.0 (SP2) Market by Price messaging formats
- Event-driven market price and trade information
- Enhanced market state dissemination
- Increased timestamp granularity
- Opt-In functionality for Order identifier on both market data and order entry messages
- MBO (Market by Order) on the same feed as MBP providing full depth of book
- Order identifier on both market data and order entry messages (mandatory based on MBO availability)

CME Group Login

CME Group Login is a self-managed, centralized user profile service that authenticates access to CME Group applications and services. CME Group Login provides:

- Access to CME Group applications and services with one user ID and password.
- Ability to update or change your CME Group Login profile online, without paperwork.
- Access to CME Group systems with permissions for multiple clearing firms, when appropriate.
- A unique user ID that is retained when changing clearing firms or employers.

Learn more about CME Group Login at cmegroup.com/login.

CME Globex Risk Management Tools

Cancel on Disconnect

Cancel on Disconnect (COD) monitors the order routing interface iLink system for involuntary lost connections between customers and the CME Globex platform. If a lost connection is detected, COD cancels all resting futures and options orders for the disconnected registered customer. This does not include Good Till Cancel (GTC) and Good Till Date (GTD) orders. It is the customer's responsibility to reenter all orders that have been canceled by COD. There is no charge for the COD service.

Features:

- Free service

Learn more about this tool at cmegroup.com/cod.

Kill Switch

Kill Switch is a GUI that is designed to allow firms a one step shutdown of all their CME Globex activity at the SenderComp ID level.

When the Kill Switch functionality is activated by the permissioned firm, all order entry is blocked and all working orders are cancelled for either a selected subset or all of firm's SenderComp IDs.

Kill Switch functionality includes:

- Day Orders and Good Till messages are blocked when Kill Switch is invoked, however, Kill Switch will not cancel resting Good Till or Day Orders when a market is "closed" or in the final "30 seconds" prior to an open.
- Impacted customers are prevented from submitting any message other than what is required to keep alive the connection with the exchange (session management).
- Only orders intended for CME Group core match engines are supported.
- Customers receive a reject message with entity level and administrator role information.
- Blocking takes less than one second, though the cascading cancellations may extend beyond this time frame.

CME Globex Credit Controls (GC2)

CME Globex Credit Controls (GC2) provides pre-execution risk controls and allows Clearing Firm Risk Administrators to set real-time credit limits on all CME Globex customers. Clearing Firm Risk Administrators can define trading limits and dynamically act if those limits are exceeded. GC2 is intended to complement existing Clearing Firm risk systems and front-end risk tools. GC2 access is only available at the Class A Clearing Member level. As stated in the CME mandatory Credit Control Policy (Rule 949), clearing members must employ GC2 credit control functionality on every one of their CME Globex Executing Firms.

Learn more about this tool at cmegroup.com/gc2.

Risk Management Interface (RMI)

An Application Programming Interface (API) and Graphical user interface (GUI) that supports granular, pre-trade risk management for Clearing firms. RMI allows Clearing Firms to block or unblock order entry by execution firm, account, exchange, derivative type, and/or side.

For more information, visit cmegroup.com/rmi.

FirmSoft

FirmSoft is a free, browser-based order management tool that provides real-time visibility and access to working and filled orders across multiple firm IDs. FirmSoft provides view and cancel capabilities for all CME Globex orders.

Users can view:

- Order information, including status
- Fill information, including partial fills
- History
- Details, including timestamps and cancel replace history

Users can also cancel an individual order, a group of orders or all working orders for which they are permissioned with FirmSoft.

Market participants also have the ability to call into the GCC to cancel and/or status orders based on their CME Group Login profile permissions being enabled in FirmSoft.

Learn more about this tool at cmegroup.com/firmsoft.

Inline Credit Controls (ICC)

ICC is an optional risk management function that is used by Clearing Member Firms (CMF) and Executing Firms (EF) to set daily position limits for CME Globex orders, per product, at the account level. Each order will be checked on an in-line, preexecution basis.

For more information, visit cmegroup.com/icc.

THE TRADING SESSION

Trading sessions on the CME Globex platform meet customer needs around the world.

Electronic Trading Availability

Virtually all CME Group products trade electronically at some point during the day, but specific schedules vary according to product.

Note: Special holiday trading hours are available at cmegroup.com/holiday.

A current list of products on CME Globex and specific availability can be found online at cmegroup.com/trading_hours.

Trading Sessions and States

Trading on the CME Globex platform is generally available Sunday evening through late Friday afternoon. Exact trading hours vary by product. CME Globex sessions start in the afternoon or evening and mark the beginning of the next trading day (for example, orders entered during Sunday's evening session are dated for and cleared on the following Monday).

Market States

All CME Globex markets cycle through the daily order entry states. Below are the pre-defined market states:

1. Pre-Opening

A predetermined time before the trading session opens when customers can begin entering, modifying and canceling orders for the next trading day, but no trades are executed.

2. Pre-Opening/No-Cancel

During the Pre-Opening period, the last 30 seconds prior to transitioning to Open.

The Pre-Opening/No-Cancel period allows orders to be placed for the next trade date, however it does not allow orders to be canceled or modified. Trades are also not executed during this period.

3. Open

The period of time when orders are sent and matched in real time, based on the product's trading times.

4. Pause

A predetermined time when customers can only cancel orders. No trades are executed.

5. Closed

This CME Globex state change cancels, day orders and advance the trade date.

6. Post Close/Pre Open (PCP)

This market state allows order placement, modification, and cancellation of GTC/GTD orders only. No matching takes place and no action can be taken on non GTC/GTD orders.

7. Maintenance Period

Occurring between 16:00 Central Time (CT) and 16:45 (CT) Monday through Thursday.

The ability to enter, modify or cancel orders varies according to the CME Globex predefined state, as the chart below shows:

	Order Entry	Order Modification	Order Cancellation
CME Globex Session Starts 1. Pre-Opening	✓	✓	✓
2. Pre-Opening/No Cancel	✓		
MARKET OPEN			
3. Open	✓	✓	✓
4. Post Close/Pre-Open (PCP)*	✓	✓	✓
MARKET CLOSE			
CME Globex Session Ends 5. Pause			✓
6. Closed			
7. Maintenance Period			

No order functionality available

Note: All open session orders are automatically canceled at market close.

* GTC and GTD orders only.

ENTERING ORDERS ON CME GLOBEX

The CME Globex platform supports a broad array of order functionality, offering convenience and flexibility to meet a wide variety of individual trading needs. This section summarizes the order types and order duration qualifiers available in the CME Group markets.

Supported Order Types and Functionality on CME Globex – By Product Line

Order Types	Agriculture	Equities	FX	Interest Rates		Energy	Metals	Real Estate	Weather
				CME	CBOT				
Limit	F,O	F,O	F,O	F,O	F,O	F,O	F,O	F	F
Market Order with Protection	F,O	F,O	F,O	F,O	F,O	F,O	F,O	F	F
Market to Limit	F,O	F,O	F,O	F,O	F,O	F,O	F,O	F	F
Stop Limit	F	F	F	F	F	F	F	F	F
Stop Order with Protection	F	F	F	F	F	F	F	F	F

Order Types	Agriculture	Equities	FX	Interest Rates		Energy	Metals	Real Estate	Weather
				CME	CBOT				
Minimum Quantity	F,O	F,O	F,O	F	F,O	F	F	F	F
Display Quantity	F,O	F,O	F,O+	F*	F,O	F,O	F,O	F,O	F

*Allowed only with a Hidden Quantity / Display Quantity less than or equal to 60:1
+Only for non-Big Six (excluding 6A, 6B, 6C, 6E, 6J, 6S)

Functionality	Agriculture	Equities	FX	Interest Rates		Energy	Metals	Real Estate	Weather
	CME	CBOT							
Cross	O	O*	O	O	O	O	O		
Mass Quote	O	O	O	O	O	O	O		
UDS	O	O	O	O	O	O	O		

*Only allowed between 7 p.m. and 7:45 a.m.

KEY: F = Available for futures O = Available for options

Order Types

The availability of specific order types varies based on how customers access CME Globex and the products they trade.

Limit

A Limit order allows the buyer to define the maximum price to pay and the seller the minimum price to accept (the limit price). A Limit order remains on the book until the order is either executed, canceled or expires.

Market Order with Protection

Market orders at CME Group are implemented using a "Market with Protection" approach. Unlike a conventional Market order, where customers are at risk of having their orders filled at extreme prices, Market with Protection orders are filled within a predefined range of prices (the protected range). The protected range is typically the current best bid or offer, plus or minus 50 percent of the product's Non-Reviewable Trading Range. If any part of the order cannot be filled within the protected range, the unfilled quantity remains on the book as a Limit order at the limit of the protected range.

Stop Limit

A resting Stop Limit order is triggered when the trigger price is traded in the market. The order then becomes a Limit order with the customer's specified limit price. The order is executed at all price levels between the trigger price and the limit price. If the order is not fully filled, the unfilled quantity remains in the market at the limit price. A buy Stop Limit order must have a trigger price greater than the last traded price for the instrument. A sell Stop Limit order must have a trigger price lower than the last traded price for the instrument.

Stop Order with Protection

A Stop with Protection is a Stop Limit order (see above) with the limit price calculated based on:

- The trigger price, and
- The protected range.

The protected range is typically the trigger price, plus or minus 50 percent of the Non-Reviewable Trading Range for that product. The limit price for a buy Stop with Protection will be calculated by adding the protected range to the trigger price. Likewise, the limit price for a sell Stop with Protection will be calculated by subtracting the protected range from the trigger price. Once the limit price for the order is calculated, it becomes a Stop with limit order in all respects.

Request for Cross (RFC)

A Request for Cross Order ("RFC Order") is required to be entered to facilitate options orders that result from allowable pre-execution communications. An RFC Order contains both the buy and sell sides in a single message, and must be entered by one party at a single price and quantity. Both sides of the RFC Order are exposed to the market and will first be matched against resting orders that are at the same or a better price than the price on the RFC Order prior to any portion of the two orders matching opposite each other. Any unmatched quantity on one side of the RFC Order will remain as a working order. Please refer to Rule 539 for additional information on RFC Orders.

Mass Quote

A Mass Quote is a bundle of two-sided, actionable quotes in one or more options markets submitted via a single message. Only designated customers can submit Mass Quotes, and they have special protections that help mitigate their risk in matched transactions.

Additional Notes on Order Types

- Some order types require an opposing bid or offer to be present in the market before the order can be submitted. Entering one of these order types without an opposing bid or offer present will cause the order to be rejected.
- Front-end system vendors may offer additional functionality in their applications. Check with your vendor for more information.
- Information on Non-Reviewable Trading Ranges is available in the Client Systems Wiki.

Order Quantity and Duration

Order duration qualifiers allow you to indicate how long the order will be valid – for example, if it should remain open for the next trading session if it isn't executed by the end of the trading session in which it was entered. An order submitted without an order duration qualifier will be eliminated at the end of that same trading session if not filled, or if it was received between trading sessions, at the end of the following session.

Day

An order to buy or sell a contract during that trading day only. Day orders that have been placed but not executed on a trade date do not carry over to the next trade date. Unexecuted Day orders are eliminated at the end of the day.

Good 'Till Canceled (GTC)

GTC orders will remain in force until executed, canceled or the contract expires.

Good 'Till Date (GTD)

GTD orders remain in force through the end of the specified date unless executed or canceled, or the contract expires.

Fill and Kill (FAK)

FAK orders are immediately filled in whole or in part at the specified price or better. Any remaining quantity is eliminated.

Fill or Kill (FOK)

FOK orders are canceled if not immediately filled for the specified minimum quantity at the specified price or better.

Minimum Quantity

A Minimum Quantity order is immediately executed only if a certain minimum quantity of that order can be immediately matched. If the minimum quantity cannot be immediately filled, the entire order is canceled.

Display Quantity

A Display Quantity displays only a portion of the order to the marketplace. When the displayed quantity has been filled, another portion equal to the displaced quantity is then displayed as a new order

Additional Functionality

UDS

User-Defined Spreads (UDS) functionality enables customers to create and trade unique instruments intra-day. A UDS: Covered instrument is composed of an outright option or options strategy covered by one or more underlying outright futures.

A UDS: Combos instrument is composed of any or all of the following:

- Exchange-defined outright option(s)
- Existing user-defined spread(s)
- Futures outrights

MARKET PROTECTIONS

The following features minimize excessive price movements on the CME Globex platform and ensure fair, competitive markets.

Velocity Logic

Velocity Logic is designed to detect market movement of a predefined number of points either up or down within a predefined time. Velocity Logic introduces a momentary suspension in matching by transitioning the futures instrument(s) and related options into the Reserved/Pause State.

Whenever a lead month futures instrument is placed in a Reserved State, the Options Auto-Reserve functionality automatically pauses matching in the associated options markets. All resting Mass Quotes are canceled when the Auto-Reserve functionality is initiated. This state is maintained for a few seconds after the futures contract has resumed trading. During the reserved period, customers can submit, modify and cancel all orders except Market Orders and Mass Quotes; Mass Quotes and Market Orders are rejected.

Price Limits and Circuit Breakers

Numerous CME Group products have rules that establish daily price limits and/or circuit breakers in order to promote market confidence and mitigate risks to the market infrastructure by allowing market participants time to assimilate information and mobilize liquidity during periods of sharp and potentially destabilizing price swings. Circuit breakers are calibrated at defined levels and completely halt trading for a defined period of time or for the balance of the day's trading session. Price limits allow trading to continue, but only within the defined limits.

Price Banding

To ensure fair and orderly markets, CME Group has a price banding mechanism in place that subjects all incoming electronic orders to price verification and rejects all orders with clearly erroneous prices. Price bands are monitored throughout the day by the CME Global Command Center (GCC) and adjusted if necessary. A dynamic enhanced options price banding system is implemented for options and options spreads traded on the CME Globex platform.

For complete banding information on each CME Globex product, including information on the enhanced options price banding, visit cmegroup.com/pricebanding.

Reserve Price Band Multiplier

When a non-implied Lead Month and/or Secondary Month futures instrument transitions into the Reserved State, the price band values are expanded by a predefined Reserve Price Band Multiplier. The Reserve Price Band Multiplier expands the default Price Band by a positive whole number multiplier (e.g., 2x or 3x) during the Reserved State, to allow Limit and Stop order entry from the non-biased Buy or Sell side of the market. Allowing Limit and Stop order entry supports the creation of an Indicative Opening Price (IOP) at a fair market value level, thus supporting a more accurate reopening.

Matching Algorithms

To ensure that customers get the best possible executions at the fairest prices, the CME Globex platform employs predefined sets of matching rules—algorithms—designed to best meet the needs of market participants in each product group. Learn more about these features by visiting the Client Systems.

MARKET OPERATIONS

The CME Global Command Center (GCC)

The GCC provides market operations, support and customer service for all electronic trading on CME Globex. That includes handling all CME Globex inquiries and requests for assistance from CME Group-registered contacts. The GCC supports the matching engine, order routing and market data interfaces and network connectivity.

Additionally, the GCC also provides customers with order status and, in cases of emergency, may cancel orders for customers. The GCC will only provide critical assistance to CME Group registered contacts. Critical assistance consists of order status, order cancellation and net position. If you are not registered, have your firm administrator call the GCC on your behalf.

Areas of expertise include:

- Product and market information
- Block trade reporting
- Performance troubleshooting
- GCC notifications
- Product scheduling
- Trading halt management
- Limit move procedures
- Error trade oversight and resolution
- Liability claim support
- Order status and cancellation
- Settlement and limit price maintenance
- Price banding oversight
- Product state management (launching, listing, delisting, activations and expirations)

Hours

The GCC is available from 14:00 CT Sunday through 16:45 CT Friday. An international number is provided for the convenience of our global customers.

How to contact the GCC

U.S.:
+1 800 438 8616

Europe:
+44 20 7623 4747

Asia:
+65 6532 5010

Order Cancel/Status Requests

In order to process an order cancellation or status, the GCC requires CME Group-registered contacts to be able to confirm their identity (through security information) and provide:

1. CME Group Login
2. Nature of inquiry
3. Account number
4. Instrument, buy or sell and quantity

Market participants also have the ability to call into the GCC to cancel and/or status orders based on their CME Group Login profile permissions being enabled in FirmSoft.

GCC Phone Requests – Quick Navigation Guide

This quick reference guide to the automated GCC telephone system is designed to help customers navigate the phone system more quickly

Note: You do not need to wait for the menu prompts to play, you can select your option at any time.

CME GLOBAL COMMAND CENTER PHONE MENU

GCC – +1 800 438 8616

GCC Outside U.S. – +44 20 7623 4747 / +65 6532 5010

Press Option 1 for Market Support

Sub Menu Option:	Description:
1	Invoke the Error Trade Policy
2	Order Status, Order Cancellation
3	All Technical or Market Support
4	Report a Block Trade

Press Option 2 for CME ClearPort and API Support

Sub Menu Option:	Description:
1	To facilitate a CME ClearPort Transaction including corrections
2	Other CME ClearPort, API and CME ConfirmHub Support

Note: You can select the desired option at any time after the menu begins.

For GCC Administrative Assistance:	+1 312 580 5387
For Certification and New Release Environments, call CSET:	United States: +1 312 930 2322 Europe: +44 20 3379 2803 Asia: +65 6593 5593 Email: cset@cmegroup.com

All calls to the GCC are recorded. **cmegroup.com/gcc**

GCC Notification System

To keep customers informed, especially during system emergencies, the GCC also provides CME Group-registered customer contacts with real-time CME Globex updates via telephone, e-mail and pager. In emergency situations, special procedures are implemented to enhance information sharing.

If CME Group determines that an event is likely to affect a significant number of customers or may require an emergency market halt, the information is disseminated via GCC Targeted Messaging, Market Data Platform administration messages, the CME Group Web site and/or the GCC Phone Menu.

Registered contacts also can sign up for GCC Targeted Messaging to receive messages via e-mail, pagers, mobile phones and land phones.

If markets are halted, the GCC will send regularly timed messages throughout the investigation of the event. Once the issue has been resolved, the GCC will send appropriate messages with the same methods used to announce that the event has been resolved.

In the event of a Market Halt, the GCC will also make this information available to all customers via cmegroup.com.

Trade Review Policy

If an order execution occurs at a price not representative of the current market, the CME Group customer may call the GCC to request to have the trade reviewed.

Some important notes:

The customer must call the GCC within eight minutes of the error trade. A trade stands if the GCC is not notified within the eight-minute limit. The GCC also sends out a message (including the contract, time of trade, quantity and trade price) to all CME Globex registered contacts via Targeted Messaging alerting them that the trade has been questioned.

In order to cancel or price adjust a trade, the GCC must first determine if the trade is within the Non-Reviewable Trading Range:

- If a trade is within the Non-Reviewable Trading Range, the trade will stand and cannot be canceled or price adjusted.
- If a trade is outside the Non-Reviewable Trading Range, the GCC will send a message (including the contract, time of trade, quantity and trade price) to all CME Globex registered contacts via Targeted Messaging alerting them that the trade has been canceled, adjusted or stands.

Note: All futures and options contracts are price adjusted, not canceled, except in certain circumstances. View more information on the trade cancellation and price adjustment procedures in Rule 588, including the Non-Reviewable Trading Ranges for each product.

CME Globex Messaging Efficiency Program

The CME Globex Messaging Efficiency Program creates fair business guidelines by which customers are billed a surcharge for overly high message rates. This program benefits all customers trading on CME Globex by discouraging excessive messaging abuses. This helps ensure that CME Globex maintains the responsiveness and reliability that our customers around the world have come to expect.

The CME Globex Messaging Efficiency Program scoring system establishes an executing firm's messaging score based on the specific message type submitted. During this process, the Volume Ratio measures the ratio between an executing firm's messaging score and the executing firm's traded volume in a particular product group between 7:00 a.m. and 3:15 p.m. Central Time (CT). If an executing firm's daily Volume Ratio exceeds the established Product Group Benchmark and all exemption types have been exhausted or are not applicable, CME Group will levy a surcharge of $1,000 per product group, per day.

To account for unusual market conditions, there are a number of exceptions to the CME Globex Messaging Efficiency Program.

More information on the CME Globex Messaging Efficiency Program is available at cmegroup.com/messagingefficiencyprogram.

The Liability Claim Process

Customers who take market action based upon an incorrect order status provided by the GCC or a CME Group system, service or facility may complete a Liability Claim Form to recover realized losses. In general, CME Group may accept liability for direct losses incurred by a customer who takes market action based upon an incorrect order status provided by the GCC or a CME Group system, service or facility. CME Group liability in such situations is subject to cumulative liability caps. A customer who receives an incorrect status must take immediate action to limit any losses as soon as the customer knows or should have known that the order status information is incorrect.

In addition, CME Group will not be liable if it provides prior notification that a CME Group system, service or facility may produce such incorrect order status information and a means to access the correct information. CME Group liability to such a customer will be limited to the price at which the customer's position could have reasonably been liquidated.

If you have any questions regarding the Liability Claim Process, please contact the GCC or refer to the complete text of the policy in the Liability Claim Form document posted on the CME Group Web site.

CME Clearing

In today's market environment, effective risk management is a business imperative. Risk management opens the door to opportunity and it supports faster and smarter decisions. CME Group's centralized clearing capability brings the benefits of transparency, trust and confidence to our markets. By acting as the counterparty to every trade, CME Clearing mitigates counterparty credit risk, meaning that for every trade completed on our exchange, we guarantee the financial soundness of both parties. By being at the center of every transaction, we can protect everyone's interest and ensure the integrity of the marketplace.

Key Features of CME Clearing:

- **Your counterparty credit risk is substantially mitigated** as CME Clearing becomes the buyer to every seller and the seller to every buyer. We guarantee the financial soundness of both parties.
- **Accumulation of debts/losses is limited** and transparency is achieved as CME Clearing marks your positions to market twice daily.

- **Financial safeguards** stand ready to mitigate systemic risk.* In over a century of excellence, CME Clearing has never had a default. For more information on financial safeguards, visit cmegroup.com/clearing/cme-clearing-overview/safeguards.html.
- **Customer segregation protections** under which your funds are not subject to creditor claims against your own clearing firm should it become financially unstable or insolvent are included.
- **Multilateral netting helps you gain capital efficiencies** and decreases your credit exposure.
- **Your choice of execution is preserved** and made safer. You have the flexibility to manage your risk on-exchange or with cleared-only services for OTC products, all with the performance guarantee of CME Clearing.

Electronic Market Data (E-data) Information

CME Group provides customers with access to real-time, delayed and historical market data via Internet-based E-data applications.

Real-Time Data

CME E-quotes

The CME E-quotes application offers a best-in-class display of data. In both web-based desktop and mobile editions, CME E-quotes delivers real-time, delayed and historical quotes and charts, and analytics to your exact specifications. Benefit from global access and a powerful combination of sophistication, usability, performance and price.

For more information about CME E-quotes, visit cmegroup.com/e-quotes.

Delayed Data

Charts

This application provides current and historical performance of CME Group contracts with free delayed snapshot charting.

Delayed Futures and Options

Customers can get detailed delayed price information at each product and contract level.

Historical Data

CME DataMine

With a broad array of data types, CME DataMine makes it easier than ever to access historical price information in a form that can be easily used to develop, enhance or refine trading algorithms. By providing market depth, top-ofbook, time and sales, and end-of-day data, CME DataMine has established itself as a premier information resource. Customers can access daily updates through a secure cloud service as well as conduct one-time bulk orders.

For more information on CME DataMine, visit cmegroup.com/datamine.

Important Contacts

Contact Information	Department	Phone
CME Globex Market Access	CME Global Account Management U.S. Europe Asia	 +1 312 634 8700 +44 203 379 3754 +65 6593 5505
Market and System Inquiries	CME Global Command Center (U.S.) U.S. Europe Asia	 +1 800 438 8616 +44 20 7623 4747 +65 6532 5010

CME GLOBEX ELECTRONIC TRADING RULES AND POLICIES

The following list of rules and policies is not meant to be exhaustive or complete, but is intended as a summary of the most common CME Globex rule or policy questions. For the text of actual rules or interpretations, please refer to the CME, CBOT or NYMEX Rulebooks, which are available online at cmegroup.com, or the various Market Regulation Advisory Notices or other policies that have been published on the Web site. This document should not be relied upon as the official source of the rules. Further, while many rules have been harmonized across CME Group Exchanges, several rules remain different and market participants must be aware of these differences. Specific differences are noted with respect to the rules referenced below.

Accessing CME Globex

Rule 574 outlines certain requirements for gaining access to CME Globex, including a requirement that all connections to CME Globex be guaranteed by a clearing member firm. Additionally, all individuals entering orders in other than a clerical capacity on behalf of non-member customers must have appropriate industry registration. These orders may be entered only from designated areas on the trading floors or from the premises of an entity registered to conduct customer business. Any clearing member firms providing CME Globex access to their customers must comply with all Credit Control requirements as set forth in Schedule 6 of the Customer Connection Agreement.

Market Data Usage on CME Globex

Any entity connecting to CME Group for market data is required to sign the Market Data License Agreement (MDLA) and complete a Scope of Use document. The Market Data License Agreement (MDLA) covers acceptable uses of all CME Group market data and participating Partner Exchanges.

CME Globex Trade Cancellations and Price Adjustments

Rule 588 states that trade prices determined by GCC to be within the Non-Reviewable Trading Range will generally not be canceled or adjusted. The only exception to this rule is when the GCC determines that allowing a trade to stand as executed may have a material, adverse effect on the integrity of the market. The GCC may review a trade based on its analysis of market conditions or a request for review by a CME Globex user. A request for review must be made as soon as possible, but will generally not be considered if more than eight minutes have passed since the trade occurred. A party responsible for an order(s) which results in a trade price adjustment or a trade cancellation may be liable for realized losses incurred by affected parties pursuant to the criteria outlined in Rule 588. The Non-Reviewable Trading Ranges for all products and the Bid/Ask Reasonability Allowance for options trading on CME Globex are set forth in Rule 588.

Identification of CME Globex Terminal Operators

Rule 576 requires that CME Globex terminal operators be identified to the Exchange in the manner prescribed by the Exchange, and are subject to Exchange rules. For parties accessing CME Globex through iLink, clearing member firms or ISVs will issue the workstation user ID (known as the Tag 50 ID).

The user ID must be submitted with each order sent to CME Globex. Additionally, some user IDs are required to be registered with the applicable Exchange by an Exchange clearing member firm. **In no event may a member or clearing member firm enter or permit another party to enter an order with a user ID other than the individual's own unique user ID.**

Clearing member firms must maintain historical records of the identities of each user for at least five years. Additionally, please see the most recent Market Regulation Advisory Notice concerning Tag 50 IDs and registration requirements which may be accessed here cmegroup.com/rulebook/rulebook-harmonization.html.

Rules and Requirements for Entering Orders on CME Globex

This section highlights the most commonly referenced rules and requirements for entry of orders into CME Globex**. It is not intended as an exhaustive list of all such rules and requirements.**

- Every order entered into CME Globex must include an account designation, although there is an exception to the requirement of entering the actual account number if the order is entered by an eligible account manager for accounts eligible for post execution allocation as set forth in Rule 536.C.
- Pursuant to Rule 530, no person may enter an order into CME Globex for an account they own, an account in which they have a financial interest or an account over which they have discretionary trading authority (including an order allowing discretion as to time and price) when such person is in possession of any order for another party that CME Globex is capable of accepting.
- Pursuant to Rule 548, all non-discretionary customer orders must be entered into CME Globex in the order received. If the non-discretionary order is not able to be entered immediately upon receipt, it must be entered when it becomes executable.
- Pursuant to Rule 529, no person may withhold or withdraw any order from the market for the benefit of any person other than the person placing the order.
- Pursuant to Rule 531, a person in possession of a customer order may knowingly trade against his customer order for his own account only if the customer order has been entered immediately upon receipt and has first been exposed on CME Globex for a minimum of five seconds in the case of futures orders or for a minimum of 15 seconds in the case of options orders.
- Pursuant to Rule 532, no person may disclose another person's order or solicit or induce another person to disclose order information. An exception to this prohibition is set forth in each Exchange's Rule 539.C., which allows parties to engage in pre-execution communications regarding CME Globex trades in certain products provided that the parties comply with the requirements set forth in the rule. Please see the section on pre-execution communications for a more detailed discussion of the rules regarding pre-execution communications concerning CME Globex trades.
- Pursuant to Rule 534, no person shall place or accept buy and sell orders in the same product and expiration month, and, for a put or call option, the same strike price, for accounts with the same beneficial ownership or for accounts with common beneficial ownership; and where the person knows or reasonably should know that the purpose of the orders is to avoid taking a bona fide market position exposed to market risk.

CME Globex Record Keeping and Records Retention Requirements

For each order entered into CME Globex, Rule 536.B. requires the terminal operator to input a) the user ID assigned him by the Exchange, a clearing member or other authorized entity (Tag 50 ID) b) the price, quantity, product, expiration month, CTI code, automated or manual indicator (Tag 1028) and account number (except as provided in Section C.), and, for options, put or call and strike price.

Definitions concerning each of the four CTI codes are set forth in Rule 536.D.

Each order entered into CME Globex must be entered with the correct user ID assigned by the Exchange, a clearing member or other authorized as described earlier in this document.

Pursuant to Rule 536.B, terminal operators who receive orders that are capable of and are immediately entered into CME Globex are not required to create a written, time-stamped order. Orders that are not or cannot be entered immediately into CME Globex must be reduced to writing and include the date, time stamp, order instructions and account designation. CME Globex users are encouraged, but not required, to print and save a listing of all orders they enter into CME Globex during each session.

Clearing member firms are responsible for maintaining or causing to be maintained for five years an audit trail for electronic orders entered into CME Globex through iLink, and must be able to display this data in a pre-approved format using terminology and field names consistent with other CME Group systems. Please see Rule 536 in each Exchange's Rulebook for more information on record keeping requirements.

Pre-Execution Communications Concerning CME Globex Trades

In certain markets, market participants are allowed to engage in pre-execution communications with regard to transactions executed on CME Globex . Such pre-execution communications are permitted in all CME, NYMEX and COMEX futures products traded on CME Globex, and in all CBOT interest rate, equity index, ethanol, commodity index and real estate index futures products and CBOT interest rate swaps traded on CME Globex. Pre-execution communications remain prohibited in all CBOT grain and oilseed futures products traded on CME Globex. In order for parties to engage in pre-execution communications where allowed, they must adhere to the requirements and procedures set forth in each Exchange's **Rule 539.C** and the applicable Market Regulation Advisory Notice.

Some circumstances in which pre-execution discussions might take place include the following:

- A firm may wish to contact potential contra parties on behalf of its customers or for the benefit of the firm proprietary account, in order to gain some assurance that someone will be ready and willing to take the opposite side of the order. These opposite parties could be the firm's customers, other firms' customers or proprietary traders, or individual traders.
- An individual member may also contact potential contra parties to trade opposite his or her personal trading account.

More detailed information, including the text of Rule 539.C. and a question and answer document concerning the policies and procedures concerning CME Globex pre-execution discussions are available on the CME Group Web site via the following link: cmegroup.com/rulebook/rulebook-harmonization.html.

Pre-execution communications concerning trades intended for open outcry/pit execution are expressly prohibited and constitute a violation of Rule 539.

APPENDIX – GLOSSARY

After-Hours Electronic Contracts (i.e., ETH only) After-hours electronic contracts trade on the CME Globex platform only after they stop trading via open outcry on the trading floor.

Application Program Interface An application program interface (API) is a set of tools and protocols that help integrate a solution with other software programs or facilitate the customization of a user interface.

CME Clearing The division of CME Group that confirms, clears and settles all trades. CME Clearing also collects and maintains performance bond funds, regulates delivery and reports trading data.

CME Direct CME Direct is a highly-configurable trading front-end system that allows customers to directly access CME Group markets.

CME Globex The CME Group electronic trading platform.

CME Global Command Center (GCC) The department that supports and maintains the CME Group electronic trading environment.

Continuous Trading Phase The phase on the CME Globex platform in which orders are sent to the market for real-time matching.

Cross Margin The process of allowing for a reduction in performance bond (margin) requirements. This reduction is possible because risk is reduced when offsetting positions are cleared by the same or affiliated clearing members.

CSET *See Customer Support for Electronic Trading.*

Customer Forum A communication vehicle to update customers and solicit feedback on topics related to CME Group's electronic trading strategy over the next six to 12 months, including new policies, enhancements and products.

Customer Support for Electronic Trading (CSET) The department that assists with certification and development to CME Globex.

Derivatives Financial instruments whose value is based upon other financial instruments, such as stock indexes, interest rates or interest rate indexes..

E-px (e-"packs") A Web-based application that provides real-time Eurodollar pack and bundle data, including prices for the 40 underlying quarterly Eurodollar futures contracts and a daily log of all executed Eurodollar spread trades.

E-quotes A CME Group real-time market data application that offers streaming quotes directly from CME Group for all futures products, in addition to interactive charts and OsterDowJones news.

Error Trade A trade that falls outside a contract's Non-Reviewable Range and is deemed to have been submitted in error. Such trades can be removed from official CME Group records, including Time and Sales information.

FCM *See Futures Commission Merchant*.

FEC-ETP *See Front-End Clearing System Electronic Trade Posting.*

FirmSoft A user-friendly, browser-based order management business continuity tool offered at no cost by CME Group to provide firms easy access to view and cancel their orders.

Front-End Clearing System Electronic Trade Posting (FEC-ETP) Application that enables brokers to inquire about CME Globex net positions and spread prices. FEC-ETP is accessible from any PC with an Internet connection.

Fungibility Interchangeability of contracts. For example, five E-mini S&P 500 contracts are fungible with one standard-sized S&P 500 contract

Futures Commission Merchants (FCM) Individuals, associations, partnerships, corporations and trusts that solicit or accept orders for the execution of a commodity transaction on and pursuant to the rules of a contract market, and which accept payment from or extend credit to customers.

GCC *See CME Global Command Center.*

GCC Notification System The method the GCC uses to send messages regarding system events to customers via e-mail, pagers, fax, mobile phones and land phones.

Hedging Offsetting price risk in a cash market by taking an equal but opposite position in the futures market. A means of protection against loss due to adverse price fluctuations.

Hidden Quantity A Hidden Quantity order – also called Max Show or Iceberg – displays only a small portion of the order to the marketplace. When the displayed quantity has been filled, another portion is then displayed.

IB *See Introducing Broker.*

iLink The order routing interface to CME Globex, based on the FIX 4X protocol. iLink creates a session between CME Group and the client through FIX protocol, eliminating the need for Standard Template Libraries (STLs).

Implied Functionality Implied prices integrate bids and offers in both spreads and their outright contracts to provide the most liquid possible markets with the best possible prices.

Independent Software Vendor (ISV) A company that makes and sells software products that run on one or more computer hardware or operating systems.

Indicative Opening Price (IOP) The price at which a product would trade upon the open, if possible, or the opening bid or offer if no trade would occur. At predefined times prior to the opening on CME Globex, an IOP is calculated as orders are entered for each product. Trading begins at an equilibrium price that falls within the overlap of the bid and offer prices. The IOP is broadcast to all CME Globex users and to the CME Group market data/ticker feed.

Internet Service Provider (ISP) A company that provides Internet access.

Introducing Broker (IB) A firm or person engaged in soliciting or accepting and handling orders for the purchase or sale of futures contracts, subject to the rules of a futures exchange, but not accepting any money or securities to margin any resulting trades or contracts. The IB is associated with a correspondent futures commission merchant and must be licensed by the Commodity Futures Trading Commission (CFTC).

ISP *See Internet Service Provider.*

ISV *See Independent Software Vendor.*

Local Pre-Processing Additional functionality an ISV may provide to its customers before the order is transmitted to the CME Group electronic trading platform.

MDP 3.0: Market Data Platform (MDP) 3.0, a low latency and direct data access solution designed to improve customers' ability to process and act on real-time price information.

Maintenance Period A period of time in each CME Globex trading session in which the market remains closed and customers cannot enter, modify, view or cancel orders. All remaining day, session and expired Good 'Till Date (GTD) orders are purged during this time.

Market Data Platform A dual-feed multicast market data dissemination system used in conjunction with the CME Group order entry interface. Market Data Platform (MDP 3.0) offers superior scalability and more efficient data delivery. The Market Data Platform supports Simple Binary Encoding (SBE) for market data format for CME Globex market data.

Market Enabled/Pre-Opening Period The period in the CME Globex trading day in which the market is enabled and customers can begin to enter orders.

Market Data Platform A dual-feed multicast market data dissemination system used in conjunction with the CME Group order entry interface. Market Data Platform (MDP 3.0) offers superior scalability and more efficient data delivery. The Market Data Platform supports Simple Binary Encoding (SBE) for market data format for CME Globex market data.

Minimum Quantity A Minimum Quantity order is executed only if a certain minimum quantity of that order can be immediately matched.

Non-Reviewable Trading Range A range of prices used in determining if a potential error trade should be canceled. The range is based on the true market price for the contract immediately before the error trade occurred, as determined by considering all relevant information, including the last trade price on the CME Globex platform, a better bid or offer price, a more recent price in a different contract month, the price of the same or a related contract established in open outcry trading and the prices of related contracts trading in other markets (e.g., cash FX and SGX Eurodollars). A trade may not be canceled if it falls within the Non-Reviewable Trading Range for that contract. Non-Reviewable Trading Ranges vary by product.

Order Duration Qualifiers Order Duration Qualifiers define the span of time the order will be active. Default order duration is Day/Session.

Post Close/Pre-Open Phase The phase in the CME Globex trading day in which customers are allowed to enter orders, modify and cancel GTC and GTD on the grain markets only.

Pre-Opening/No-Cancel Phase The phase in the CME Globex trading day in which customers are allowed to enter orders, but are prohibited from modifications and cancellations.

Price Adjustment To alter the price of an executed trade because the order was entered or filled in error and fell outside the Non-Reviewable Trading Range (a price range) for that product. Trades are adjusted according to strictly followed established rules in the CME Globex Error Trade Policy.

Price Banding A CME Group-instituted mechanism to ensure a fair and orderly market. This mechanism subjects all incoming orders to price verification and rejects all orders with clearly erroneous prices. Price bands are monitored throughout the day by the GCC and adjusted if necessary.

Protection Points Used to define the protected range of Market and Stop orders with Protection. The protected range is typically the current best bid or offer, plus or minus 50 percent of the Non-Reviewable Trading Range for that instrument.

Surveillance Intervention Phase A period of time in each CME Globex trading session during which the market is closed and customers are not allowed order entry or modification, although cancellation of orders is permitted. The Surveillance Intervention Period is followed by the CME Globex Maintenance Period.

Trade Cancellation To remove a trade from the official CME Group records because the order was entered or filled in error and fell outside the Non-Reviewable Trading Range (a price range) for that product. Trades are canceled according to strictly followed rules established in the CME Globex Error Trade Policy.

Trading Session The time span marked by the start and end of the period during which the CME Globex platform is in operation. The start of the CME Globex session usually occurs in the afternoon or evening, and marks the beginning of the next trading day. For example, orders entered during Sunday's evening session are dated for and cleared on Monday. The trading day includes both the CME Globex trading session (i.e., ETH) and the trading floor open outcry session (i.e., RTH), if the CME Globex and open outcry sessions overlap for a given product.

Virtual Private Network A private data network that makes use of the Internet's public telecommunication infrastructure, maintaining privacy through the use of a tunneling protocol and security procedures.

VPN *See Virtual Private Network.*

As the world's leading and most diverse derivatives marketplace, CME Group (cmegroup.com) is where the world comes to manage risk. CME Group exchanges offer the widest range of global benchmark products across all major asset classes, including futures and options based on interest rates, equity indexes, foreign exchange, energy, agricultural commodities, metals, weather and real estate. CME Group brings buyers and sellers together through its CME Globex electronic trading platform and its trading facilities in New York and Chicago. CME Group also operates CME Clearing, one of the largest central counterparty clearing services in the world, which provides clearing and settlement services for exchange-traded contracts, as well as for over-the-counter derivatives transactions through CME ClearPort.

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CC480/1118

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit E

EXHIBIT E

Exhibit Request:

A list of the officers, governors, or persons performing similar functions, who presently hold or have held their offices or positions during the previous year, indicating the following for each:

1. **Name.**
2. **Title.**
3. **Dates of commencement and termination of term of office or position.**
4. **Type of business in which each is primarily engaged.**

Response:

Please find the requested information below regarding Chicago Mercantile Exchange Inc.'s Board of Directors and Management Team.

Board of Directors

Name: Terrence A. Duffy
Title: Chairman and Chief Executive Officer
Dates of commencement and termination of term of office or position: Mr. Duffy has served as our Chairman and Chief Executive Officer of CME Group Inc. since 2006. Mr. Duffy has served on the board since January 12, 1995.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Duffy also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Mr. Duffy Chairs our Executive Committee.

Name: Kathryn Benesh
Title: Director
Dates of commencement and termination of term of office or position: Ms. Benesh has served as a member of the CME Group Board since May 4, 2023.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Ms. Benesh also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Ms. Benesh is a member of our Audit and Market Regulation Oversight Committees and meets the definition of an audit committee financial expert under the rules of the U.S. Securities and Exchange Commission.

Name: Timothy S. Bitsberger
Title: Director
Dates of commencement and termination of term of office or position: Mr. Bitsberger has served as a member of the CME Group Board since May 8, 2008.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Bitsberger also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. He also serves on the Board of NEX SEF Limited. Mr. Bitsberger Chairs our Market Regulation Oversight Committee and also is a member of our Compensation, Executive, Finance and Risk Committees.

Name: Charles P. Carey
Title: Director
Dates of commencement and termination of term of office or position: Mr. Carey has served as a member of the CME Group Board since July 12, 2007.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Carey also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. He has been a member of CBOT since 1978 and is a principal of HC Technologies LLC. Mr. Carey serves as Chair of our Compensation Committee and also serves on the Executive, Finance and Nominating and Governance Committees.

Name: Elizabeth A. Cook
Title: Director
Dates of commencement and termination of term of office or position: Ms. Cook has served as a member of the CME Group Board since May 21, 2015.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Ms. Cook also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Ms. Cook has been a member of CME since 1983. Ms. Cook actively participates as co-chair of the CME arbitration and floor conduct committees and serves on the board of the CME gratuity fund. In addition, she serves on CME's membership and business conduct committees and continues her involvement as a CME Political Action Committee member. Ms. Cook is a member of our Audit and Compensation Committees.

Name: Bryan T. Durkin
Title: Director
Dates of commencement and termination of term of office or position: Mr. Durkin has served as a member of the CME Group Board since May 7, 2020.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Durkin also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Mr. Durkin is a member of our Clearing House Oversight and Risk Committees.

Name: Harold Ford Jr.
Title: Director
Dates of commencement and termination of term of office or position: Mr. Ford has served as a member of the CME Group Board since May 4, 2023.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Ford also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Mr. Ford is a member of our Finance Committee.

Name: Martin J. Gepsman
Title: Director
Dates of commencement and termination of term of office or position: Mr. Gepsman has served as a member of the CME Group Board since January 13, 1994.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Gepsman also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. He has been a member of CME for more than 25 years. Mr. Gepsman has also been an independent floor broker and trader since 1985. Mr. Gepsman currently serves as Chairman of our business conduct, membership, floor conduct and CME Gratuity Fund. Mr. Gepsman currently serves as a Vice Chairman of the CME Political Action Committee. Mr. Gepsman also serves on the membership appeals committee with the National Futures Association. Mr. Gepsman is a member of our Clearing House Oversight and Nominating and Governance Committee.

Name: William W. Hobert
Title: Director
Dates of commencement and termination of term of office or position: Mr. Hobert has served as a member of the CME Group Board since May 10, 2018.
Type of business in which each is primarily engaged: Mr. Hobert previously served from 2015 to 2017. As a Director of CME Group Inc., Mr. Hobert also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Mr. Hobert is Co-Chair of our Clearing House Risk Committee and also serves on our Clearing House Oversight Committee and our Interest Rate Swaps Risk Committee.

Name: Daniel G. Kaye
Title: Director
Dates of commencement and termination of term of office or position: Mr. Kaye has served as a member of the CME Group Board since May 9, 2019.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Kaye also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Mr. Kaye is Chairman of our Audit Committee, meets the definition of an audit committee financial expert under the rules of the U.S. Securities and Exchange Commission and serves on our Executive and Risk Committees.

Name: Phyllis M. Lockett
Title: Director
Dates of commencement and termination of term of office or position: Ms. Lockett has served as a member of the CME Group Board since May 9, 2019.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Ms. Lockett also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Ms. Lockett is the Chair of our Nominating and Governance Committee and a member of our Risk, Market Regulation Oversight Committees.

Name: Deborah J. Lucas
Title: Director
Dates of commencement and termination of term of office or position: Ms. Lucas has served as a member of the CME Group Board since May 10, 2018.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Ms. Lucas also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Ms. Lucas also serves as a director of NEX SEF Limited. Ms. Lucas has served as the Sloan Distinguished Professor of Finance at the MIT Sloan School of Management since 2011 and as the Director of the MIT Golub Center for Finance and Policy from 2012. Her current research focuses on government financial institutions and financial policy, and she teaches courses on futures and options, fixed income securities and derivatives. Ms. Lucas is a member of our Audit, Finance and Market Regulation Oversight Committees.

Name: Patrick W. Maloney
Title: Director
Dates of commencement and termination of term of office or position: Mr. Maloney has served as a member of the CME Group Board since May 7, 2020.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Maloney also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Mr. Maloney works at Constitution Capital LLC (January 2013 to present) as a commodity futures and options broker. Mr. Maloney is a member of our Risk Committee.

Name: Patrick J. Mulchrone
Title: Director
Dates of commencement and termination of term of office or position: Mr. Mulchrone has served as a member of the CME Group Board since May 7, 2020.

Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Mulchrone also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc.Self-Employed Trader, (2007 to present): Active independent trader in a broad range of commodities and stocks.

Advantage Futures, Founder (2003 to present): One of the highest volume futures clearing firms in the industry with a diverse and quickly expanding client base.

Mr. Mulchrone is a member of our Clearing House Oversight and Finance Committees.

Name: Rahael Seifu
Title: Director
Dates of commencement and termination of term of office or position: Ms. Seifu has served as a member of the CME Group Board since May 7, 2020.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Ms. Seifu also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Senior Counsel at Google LLC. Ms. Seifu serves on our Compensation and Market Regulation Oversight Committee.

Name: William R. Shepard
Title: Director
Dates of commencement and termination of term of office or position: Mr. Shepard has served as a member of the CME Group Board since January 16, 1997.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Shepard also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. He has been a member of CME for more than 45 years. Mr. Shepard serves on our Clearing House Oversight, Risk and IRS Risk Committees and Co-Chairs our Clearing House Risk Committee.

Name: Howard J. Siegel
Title: Director
Dates of commencement and termination of term of office or position: Mr. Siegel has served as a member of the CME Group Board since December 10, 1999.

Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Siegel also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc.

Mr. Siegel has been a member of CME since 1977. For more than 30 years, Mr. Siegel has been an independent trader on our CME exchange.

He also serves our Risk and Clearing House Oversight Committees (Chair).

Name: Dennis A. Suskind

Title: Director

Dates of commencement and termination of term of office or position: Mr. Suskind has served as a member of the CME Group Board since August 22, 2008.

Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Suskind also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc.

Mr. Suskind Chairs our Risk Committee and also serves on our Audit, Executive, Nominating and Governance and Market Regulation Oversight Committees. He has served as our Lead Director since May 2023.

Name: Robert J. Tierney Jr.

Title: Director

Dates of commencement and termination of term of office or position: Mr. Tierney has served as a member of the CME Group Board since May 9, 2019.

Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Tierney also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc.

Kore Trading LLC, Managing Member/Owner (2018 to present)

Self-Employed Trader (2002 to present)

Mr. Tierney is a member of our Clearing House Oversight and Nominating and Governance Committees.

Management Team

Name: Terrence A. Duffy
Title: Chairman and Chief Executive Officer
Dates of commencement and termination of term of office or position: Mr. Duffy has served as our Chairman and Chief Executive Officer of CME Group Inc. since November 1, 2006.
Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Duffy also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. Mr. Duffy Chairs our Executive Committee.

Name: Sunil Cutinho
Title: Chief Information Officer
Dates of commencement and termination of term of office or position: Mr. Cutinho has served as Chief Information Officer (CIO) of CME Group since February 16, 2022.
Type of business in which each is primarily engaged: Mr. Cutinho has served as the CIO of CME Group since 2022. Mr. Cutinho previously served as President, CME Clearing and as Managing Director, Clearing Operations & Systems. In these roles, he was responsible for collaborating with the company's clearing members and customers to develop clearing solutions for listed and OTC derivatives, including credit, interest rates and foreign exchange.

Name: Lynne Fitzpatrick
Title: President and Chief Financial Officer
Dates of commencement and termination of term of office or position: Ms. Fitzpatrick has served as Chief Financial Officer since April 1, 2023, and President since November 2024.
Type of business in which each is primarily engaged: Ms. Fitzpatrick currently oversees the company’s corporate finance, accounting, investor relations, treasury, real estate, business development, corporate strategy, strategic investments, pricing and procurement functions. Previously, she served as Senior Managing Director & Deputy Financial Officer since 2022, and as Managing Director of Corporate Development and Treasurer since 2017. She has held positions of increasing responsibility within the finance organization since joining the company in 2006.

Name: Mike Dennis
Title: Senior Managing Director Global Head, Fixed Income.
Dates of commencement and termination of term of office or position: Mr. Dennis previously served as a member of the CME Group Board from May 7, 2020, to July 8, 2024. He began his role as Senior Managing Director Global Head, Fixed Income on August 5, 2024.

Type of business in which each is primarily engaged: As a Director of CME Group Inc., Mr. Dennis also serves on the following U.S. subsidiaries of CME Group: Chicago Mercantile Exchange Inc., Board of Trade of the City of Chicago, Inc., New York Mercantile Exchange, Inc. and Commodity Exchange, Inc. ABN AMRO Clearing Chicago LLC (March 2018 to present): Chief Commercial Officer, responsible for managing sales, execution, and client services. Mr. Dennis is a member of our Clearing House Oversight and Finance Committees.

Name: Jonathan Marcus
Title: Senior Managing Director and General Counsel
Dates of commencement and termination of term of office or position: Mr. Marcus has served as Senior Managing Director and General Counsel since October 31, 2022.
Type of business in which each is primarily engaged: Mr. Marcus oversees the company's compliance, enterprise risk management, legal and market regulation functions.

Name: Tim McCourt
Title: Senior Managing Director, Global Head of Financial and OTC Products
Dates of commencement and termination of term of office or position: Mr. McCourt has served as Senior Managing Director, Global Head of Financial and OTC Products for CME Group since February 16, 2022.
Type of business in which each is primarily engaged: Mr. McCourt is responsible for leading the development and execution of the company’s global interest rate, equity index, foreign exchange, OTC, cryptocurrency and alternative investment product strategies. Previously, he served as Senior Managing Director, Global Head of Equity and Foreign Exchange Products since February 2022. He serves on the CME Ventures Investment Committee and the S&P Dow Jones Indices U.S. Advisory Panel.

Name: Hilda Harris Piell
Title: Chief Human Resources Officer
Dates of commencement and termination of term of office or position: Ms. Harris Piell has served as Chief Human Resources Officer of CME Group since October 2, 2000.
Type of business in which each is primarily engaged: Ms. Harris Piell serves as Chief Human Resources Officer of CME Group. Previously she served as Managing Director and Senior Associate General Counsel, as Director and Associate General Counsel and as Associate Director and Assistant General Counsel since 2000.

Name: Derek Sammann
Title: Senior Managing Director, Global Head of Commodities, Options & International Markets
Dates of commencement and termination of term of office or position: Mr. Sammann has served as CME Group's Senior Managing Director, Global Head of Commodities, Options & International Markets since September 1, 2006.

Type of business in which each is primarily engaged: Mr. Sammann is responsible for leading the development, execution, and management of CME Group's global Commodities portfolio, including the Energy, Metals and Agricultural business lines. He also globally leads the company's cross-asset class Options business and its growth strategy across international markets.

Name: Suzanne Sprague
Title: Senior Managing Director & Global Head of Clearing and Post-Trade Services
Dates of commencement and termination of term of office or position: Ms. Sprague has served as Senior Managing Director & Global Head of Clearing and Post-Trade Services for CME Group since February 16, 2022.
Type of business in which each is primarily engaged: Ms. Sprague serves as Senior Managing Director & Global Head of Clearing and Post-Trade Services for CME. Ms. Sprague joined the company in 2002 and has held numerous roles and leadership positions in financial management and risk management since that time.

Name: Kendal Vroman
Title: Chief Transformation Officer
Dates of commencement and termination of term of office or position: Mr. Vroman has served as CME Group’s Chief Transformation Officer since February 5, 2020.
Type of business in which each is primarily engaged: Mr. Vroman is responsible for overseeing the company’s migration process as part of its 10-year partnership with Google Cloud to transform global derivatives markets through cloud adoption.

Name: Julie Winkler
Title: Chief Commercial Officer
Dates of commencement and termination of term of office or position: Ms. Winkler has served as Chief Commercial Officer of CME Group since December 7, 2016.
Type of business in which each is primarily engaged: Ms. Winkler leads the company's sales, product marketing, research and product development, data analytics, and innovation lab functions, as well as the data services business line.

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit F

EXHIBIT F

Exhibit Request:

This Exhibit is applicable only to filing exchanges that have one or more owners, shareholders, or partners that are not also members of the exchange and should be current as of the latest date practicable within 1 month of the date Form 1-N is filed. If the exchange is a corporation, please provide a list of each shareholder that directly owns 5% or more of a class of a voting security of the Security Futures Product Exchange. If the exchange is a partnership, please provide a list of all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of the partnership's capital. For each of the persons listed in the Exhibit F, please provide the following:

1. **Full legal name.**
2. **Title or Status.**
3. **Date title or status was acquired.**
4. **Approximate ownership interest.**
5. **Whether the person has control, a term that is defined in the instructions to this Form.**

Response:

Chicago Mercantile Exchange Inc. is a fully-owned subsidiary of CME Group Inc. CME Group Inc. was originally incorporated in the State of Delaware on August 2, 2001 under the name Chicago Mercantile Exchange Holdings Inc. The members of the Board of Directors of CME Group Inc. are the same as those of Chicago Mercantile Exchange Inc. CME Group Inc. has control, as defined in 17 CFR 230.405, over Chicago Mercantile Exchange Inc.

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit G

EXHIBIT G

Exhibit Request:

To the extent not covered in an exchange's rules submitted under Exhibit A, describe the Security Futures Product Exchange's criteria for membership. Describe conditions under which members may be subject to suspension or termination for infractions relating to the trading of security futures products. Describe any procedures that will be involved in the suspension or termination of a member for such infractions.

Response:

Below, CME sets forth information related to gaining direct and indirect access to its trading facilities as well as information related to gaining membership with the CME. Membership is not necessary to trade on CME but rather, generally speaking, grants members reduced trading fees.

i. *Membership*

CME offers "Corporate Membership" and "Individual Membership." To trade specific products at member rates, a person or entity must be a member of the exchange on which they trade. General rules governing memberships at CME are set forth in Chapter 1 of the Rulebook.

Individual Membership allows a person to trade specific products at reduced rates and lower fees. CME offers different divisions of membership. Membership in each division enables the member to trade only a subset of products on each exchange at discounted rates. Details regarding individual membership at CME are available at https://www.cmegroup.com/company/membership/individual.html. New individual members are reviewed by the Concierge Team, who conducts a background and credit check.

Corporate Memberships enable entities to receive preferential fees and performance bond rates on their proprietary trading pursuant to applicable Exchange Rules and law. Entities must own or lease a specified number of Individual Memberships to be eligible for Corporate Membership. The types and commensurate holding requirements for corporate memberships appear in Rule 106 of the Exchange Rulebooks. Further information regarding Corporate Membership at CME is available at https://www.cmegroup.com/company/membership/corporate.html. New applicants for corporate membership must submit requested documentation and undergo a thorough review and market regulation check by CME Group's Financial and Regulatory Surveillance Department ("FRS") (as a prerequisite for approval). Member firms are subject to certain ongoing reporting obligations pursuant to Exchange Rule 130.

ii. *Direct Access*

It is worthy of note that membership at CME is not synonymous with direct access. Rather, if members want to access Globex directly, they must meet a separate set of requirements. In order to obtain direct access to Globex, a market participant must complete a Customer Connection

Agreement ("CCA") and Schedule 2. These agreements are available at http://www.cmegroup.com/globex/files/CMEGlobexConnectionAgrmt.pdf and http://www.cmegroup.com/globex/files/CMEGlobexSch2AccessRequest.pdf, respectively. Schedule 2 requests detailed information addressing how the participant intends to connect to Globex. Conversely, direct access to trading on CME, including through Globex, does not require Membership.

A market participant may execute an agreement for direct connectivity to Globex and execute trades directly thereon. CME Group offers test and production environments and a variety of connectivity options for both environments, each with different associated fees. Current connectivity options for test connections are available at http://www.cmegroup.com/globex/files/connectivityoptionstest.pdf, and current connectivity options for production connections are available at http://www.cmegroup.com/globex/files/connectivityoptions.pdf.

Customers with direct connections to Globex may utilize their own proprietary front-end systems, a CME-provided solution, or a third-party Independent Software Vendor. All applications used to connect to CME Globex must be certified. Generally speaking, to be certified, an application must properly perform certain functions such as entering, cancelling, and modifying an order. Applicants are further required to submit a sample audit trail that is approved by Market Regulation. Further information regarding connecting to Globex is available at http://www.cmegroup.com/globex/get-connected/new-customer-guide.html.

iii. *Other Indirect Participation*

All connections to the Globex system, including direct connections, must be guaranteed by a Clearing Member that assumes responsibility for all activity through the connection. *See* Exchange Rule 574. There are no specific minimum capital requirements for direct connections (or corporate members) because the Clearing Member guarantees trades to CME Clearing. Therefore, the clearing member is at risk when its customer defaults. Clearing firms, as guarantors, have incentive to ensure the competence, integrity, and authority of system users through conducting their own due diligence and applying credit controls for each customer. At the CME Group level, clearing house risk examinations review clearing member credit control levels and procedures.

It is also worthy of note that per Exchange Rule 418, any person initiating or executing a transaction on or subject to the rules of the respective Exchange, directly or through an intermediary, consents to the jurisdiction of the exchange and agrees to be bound by its rules.

iv. *Suspension, Termination and Infractions*

In relation to the powers of the Exchanges to issue penalties to ensure the enforcement of compliance, 7 U.S. Code § 12c of the CEA (Disciplinary Actions) provides for the suspensions, expulsion or other form of discipline of a member or clearing member of the Exchanges or to deny access to the Exchanges. 7 U.S. Code § 12c (a)(2) CEA requires notice to be given to the CFTC in respect of a disciplined member. Further, the CFTC may review, modify or set aside the Exchange's decisions or actions relating to a disciplined member. 7 U.S. Code § 12c (a)(2) CEA

is also implemented in Exchange Rule 437 (Notice of Discipline) which requires notice to be given to the CFTC within 30 days of any disciplinary decision or action. Any disciplinary action by an Exchange must be taken solely in accordance with the Exchange's Rules. The Business Conduct Committee and Clearing House Risk Committee may issue any of the following penalties pursuant to Exchanges Rules 402 (Business Conduct Committee) and 403 (Clearing House Risk Committee) (ensuring that compliance is enforced):

(a) censure or reprimand;
(b) fines;
(c) restitution to injured parties;
(d) limitations on positions held by respondent;
(e) suspension of trading or clearing privileges;
(f) the deposit of additional performance bond;
(g) denial of future access to market;
(h) suspension as Member or clearing member;
(i) termination of membership or clearing membership; or
(j) such other penalty as is appropriate.

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit H

EXHIBIT H

Exhibit Request:

As of the latest date practicable within 1 month of the date Form 1-N is filed, provide an alphabetical list of all members, participants, subscribers, or other users, including the following information:

1. Name.

2. If member, participant, subscriber, or other user is an individual, the name of the entity with which such individual is associated and the relationship of such individual to the entity (e.g., partner, officer, director, employee, etc.).

3. Brief description of the type of activities primarily engaged in by the member, participant, subscriber, or other user. A person shall be "primarily engaged" in an activity or function for purposes of this item when that activity or function is the one in which that person is engaged for the majority of their time. When more than one type of person at an entity engages in activities or functions, identify each type and state the number of members, participants, subscribers, or other users in each.

4. The class of membership, participation, subscription, or other access.

Response:

CME, in its capacity as an exchange, i.e., as a designated contract market (DCM), does not limit access to persons that may trade on the exchange to persons approved for membership privileges. To access CME's markets for its listed contracts, a person must have arrangements for its transactions to be cleared directly or indirectly through CME, in CME's capacity as a derivatives clearing organization (DCO).

As a DCO, CME clears and settles transactions executed in CME listed contracts for firms that are clearing members. Clearing members that are futures commission merchants may clear trades for customers (as well as their own proprietary transactions). To be approved as a clearing member of CME in CME's capacity as a DCO, a firm must be approved as a clearing member of CME in CME's capacity as a DCM.

CME Rule 106 recognizes certain categories of member firm status in the exchange, including clearing members (106.F.). The categories covering non-clearing member firms generally confer certain membership benefits including reduced transaction fees. As noted, non-clearing firms are not required to have member firm status to trade on CME, but firms for various reasons may find it cost effective to obtain member firm status if they actively trade CME-listed contracts, whether as professional trading organizations or as commercial firms trading for risk management or otherwise in connection with their commercial activities. The primary categories of non-clearing member firm under Rule 106 used by firms that actively trade on the CME include trading member firms (106.H.), equity member firms and their affiliates (106.J. and I.),

GEM institutional access member firm (106.N.),[1] electronic corporate member firms (106.R.), and family of funds member firms (106.S).

An alphabetical list of firms that are clearing members of CME that are authorized to clear transactions in CME listed contracts as of the date of this 1-N notice filing is provided below. Attached as Exhibit H-1 is an alphabetical list of firms that have clearing or non-clearing member firm status at CME as of the date of this 1-N notice filing.

1. ABN AMRO Clearing USA LLC
2. N/A
3. ABN AMRO Clearing is a globally active multi-asset prime broker, custodian and general clearing member (GCM). They provide execution services, clearing, settlement, custody, securities lending, reporting and financing services for listed derivatives, cash securities, over-the-counter (OTC) products, exchange-traded funds (ETFs), commodities and foreign exchange transactions. They provide services from our offices across Europe, Asia-Pacific, Brazil and the United States. Their coverage includes all major exchanges and execution venues.
4. Clearing Member.

1. ADM Investor Services, Inc.
2. N/A
3. ADM Investor Services (ADMIS) provides comprehensive brokerage services to institutional, commercial and retail clients. Headquartered in Chicago, Illinois, ADMIS is a registered futures commission merchant (FCM) supported by a network of affiliated brokers and sister companies across the United States and around the globe.
4. Clearing Member.

1. Advantage Futures LLC
2. N/A
3. Established in 2003, Advantage Futures is among the highest volume FCMs. Advantage clients include professional traders, proprietary trading groups, institutional clients, exchange-traded funds, foreign and domestic non-clearing FCMs, hedge funds, and individuals. Most Advantage clients are self-directed and execute their trades electronically, Advantage offers execution services from CME Group trading floor and office-based personnel.
4. Clearing Member.

[1] Membership privileges associated with this category are limited to products CME lists under the Growth and Emerging Markets (GEM) category. Those products do not include equity related products.

1. AMP Global Clearing LLC
2. N/A
3. AMP Global Clearing LLC is a Chicago-based Futures Commission Merchant (FCM) that provides direct access to global electronic futures markets. Founded in 2010, the firm caters primarily to individual retail traders, introducing brokers, and institutional clients.
4. Clearing Member.

1. ASL Capital Markets Inc.
2. N/A
3. ASL Capital Markets Inc.is a specialized, independent broker-dealer that functions as a major player in the U.S. government securities market.
4. Clearing Member

1. Banco Bilbao Vizcaya Argentaria, S.A.
2. N/A
3. Banco Bilbao Vizcaya Argentaria, S.A. is a diversified international financial group and one of the largest banking institutions in the world. Headquartered in Madrid and Bilbao, Spain, it is a constituent of the IBEX 35 and Euro Stoxx 50 indices.
4. Clearing Member.

1. Bank of Montreal
2. N/A
3. Bank of Montreal is a leading North American financial services provider and the 8th largest bank on the continent by total assets (approx. $1.5 trillion). Founded in 1817, it holds the distinction of being Canada's oldest chartered bank.
4. Clearing Member

1. Barclays Capital Inc.
2. N/A
3. Barclays Capital Inc. operates as a brokerage firm and investment advisor. The company buys and sells securities such as stocks, bonds, mutual funds, and other investment products, as well as manages investment portfolios and financial planning services. Barclays Capital serves clients worldwide.
4. Clearing Member.

1. BMO Capital Markets Corp.
2. N/A
3. BMO Capital Markets is a leading, full-service financial services provider. They offer corporate and investment banking, treasury management, as well as research and advisory services to clients around the world.
4. Clearing Member.

1. BNP Paribas Securities Corp.
2. N/A
3. BNP Paribas Securities Corp. provides banking and asset management services. The Company offers capital markets, securities services, financing, treasury, and advisory solutions. BNP Paribas Securities serves individuals, corporations, institutions, journalists, and shareholders worldwide.
4. Clearing Member.

1. BofA Securities, Inc.
2. N/A
3. BofA Securities, Inc. operates as a brokerage firm. The company offers buying and selling of securities including stocks, bonds, mutual funds, and certain other investment products, as well as providing strategic advice, working capital, transaction, and fraud and cyber security solutions. BofA Securities serves customers worldwide.
4. Clearing Member.

1. BP Energy Company
2. N/A
3. BP Energy Company is the primary American operational arm of the global supermajor BP p.l.c. Its business is that of an integrated energy company, meaning it handles everything from finding and extracting raw energy resources to refining them and selling the final products to consumers.
4. Clearing Member.

1. BP Products North America Inc.
2. N/A
3. BP Products North America, Inc. explores, develops, refines, and markets oil and natural gas. The Company produces gasoline, kerosene, distillate fuel oils, residual fuel oils, and lubricants. BP Products North America serves customers throughout the world.
4. Clearing Member

1. Bunge Chicago, LLC
2. N/A
3. Bunge Chicago, LLC functions as a localized operational arm for Bunge's massive North American grain and oilseed platform. Its primary role is to act as a bridge between Midwest farmers and the global food, feed, and fuel markets.
4. Clearing Member.

1. Cantor Fitzgerald & Co., Inc.
2. N/A
3. Cantor Fitzgerald & Co., Inc. operates as an investment bank and brokerage company. The company offers trading, securities, bonds, capital markets, investment banking, prime brokerage, commercial real estate financing, financial planning, and advisory services. Cantor Fitzgerald serves customers worldwide.
4. Clearing Member.

1. CHS Hedging LLC
2. N/A
3. CHS Hedging is a FCM registered with the Commodity Futures Trading Commission (CFTC), a member of National Futures Association (NFA), and a clearing member of the Minneapolis Grain Exchange, Chicago Board of Trade and the CME. They have provided risk management services and education for more than 30 years.
4. Clearing Member

1. CIBC World Markets Corp.
2. N/A
3. In the United States, CIBC World Markets Corp. is an U.S. Securities and Exchange Commission (SEC) registered broker-dealer, an indirect wholly owned subsidiary of Canadian Imperial Bank of Commerce, and is a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Fund.
4. Clearing Member[2]

1. Citadel Securities LLC
2. N/A
3. Citadel Securities LLC operates as a next-generation capital markets firm. The firm provides critical liquidity across a range of asset classes such as equities, options, fixed income, and foreign exchange. Citadel Securities serves clients worldwide.
4. Clearing Member

1. Citigroup Global Markets Inc.
2. N/A
3. Citigroup Global Markets Inc. provides banking and financial services. The bank offers personal banking, securities trading, wealth, treasury management, and other financial services. Citigroup Global Markets serves clients worldwide.
4. Clearing Member.

1. Clear Street LLC
2. N/A
3. Clear Street LLC operates as a diversified financial services firm. The company focuses on modernizing the brokerage ecosystem by minimizing risk, redundancy, and cost efficiency. Clear Street serves customers worldwide.
4. Clearing Member.

1. Credit Agricole Corporate and Investment Bank
2. N/A
3. Crédit Agricole Corporate and Investment Bank (CACIB) is the specialized corporate and investment banking arm of the French Crédit Agricole Group, providing tailored financial services to large corporations and financial institutions worldwide. Operating in over 30 countries, it focuses on structured finance, capital markets, and advisory services, with a strong emphasis on sustainable development and green finance.
4. Clearing Member.

[2] CIBC World Markets Corp. is not actively clearing.

1. Curvature Securities LLC
2. N/A
3. Curvature Securities LLC is a boutique, technology-driven broker-dealer headquartered in Chatham, New Jersey, with an additional office in New York City. Founded in 2013 and becoming active in 2014, the firm specializes in niche areas of the fixed income and securities finance markets. Curvature Securities is an SEC registered, FINRA member broker-dealer dealing in niche areas of the fixed income and equity markets.
4. Clearing Member.

1. Daiwa Capital Markets America Inc.
2. N/A
3. Daiwa Capital Markets America Inc. is a corporation organized under the laws of the State of New York, a broker-dealer registered with the SEC, a FCM regulated by the CFTC, and a primary dealer with the Federal Reserve in U.S. government securities.
4. Clearing Member.

1. Deutsche Bank AG
2. N/A
3. Deutsche Bank AG is a global financial service provider delivering commercial, investment, private, and retail banking. The bank offers debt, foreign exchange, derivatives, commodities, money markets, repo and securitization, cash equities, research, equity prime services, loans, convertibles, advice on M&A and IPOs, trade finance, retail banking, asset management, and corporate investments.
4. Clearing Member.

1. Deutsche Bank Securities Inc.
2. N/A
3. Deutsche Bank Securities Inc. offers investment advisory services. The company provides financial planning, portfolio management, asset allocation, risk tolerance, and pension consulting services. Deutsche Bank Securities serves customers worldwide.
4. Clearing Member.

1. Direct Access USA LLC
2. N/A
3. Direct Access is a FCM registered with the CFTC and a member of the NFA. Direct Access USA is also a full clearing member of CME, CBOT, COMEX and NYMEX.
4. Clearing Member.

1. Dorman Trading, LLC
2. N/A
3. Dorman Trading, LLC offers financial services. The company provides commodities, derivatives, and equities electronic and online trading services. Dorman Trading operates in the United States.
4. Clearing Member.

1. DRW Execution Services, LLC
2. N/A
3. DRW Execution Services, LLC is a registered broker-dealer that solely trades for its own account and is under common control of DRW Holdings, LLC.
4. Clearing Member.

1. Eagle Market Makers, Inc.
2. N/A
3. Eagle Market Makers, Inc. (EMM) is a proprietary trading firm based in Chicago, Illinois. EMM has been engaged in the futures industry for over 30 years. EMM actively participates in market making operations in American, European, and Asian futures markets with offices in Illinois, Iowa, Indiana, and Alabama.
4. Clearing Member.

1. Gelber Group, LLC
2. N/A
3. Gelber Group is a global leader in technology-driven trading with offices in America, England and Switzerland. It is a privately funded proprietary trading firm with no outside investors or customers, trading across all major asset classes in the Americas, Europe and Asia. The firm focuses on cutting-edge technology and is an industry leader in algorithmic trading.
4. Clearing Member.

1. G.H. Financials, LLC
2. N/A
3. G.H. Financials has provided market access and clearing services, on international derivatives exchanges, to professional traders and institutions around the globe since 1993. G.H. Financials is headquartered in London and operates subsidiary businesses in Chicago and Hong Kong.
4. Clearing Member.

1. Goldman Sachs & Co. LLC
2. N/A
3. Goldman Sachs & Co. LLC operates as an investment management company. The company offers investment banking, securities, asset management, capital market, valuation, bonds, funds, financial analysis, investment strategies, and advisory services. Goldman Sachs & Co. serves customers worldwide.
4. Clearing Member.

1. Hidden Road Partners CIV US LLC
2. N/A
3. Hidden Road is a FCM registered with the CFTC and a member of the NFA.
4. Clearing Member.

1. HSBC Securities (USA) Inc.
2. N/A
3. HSBC Securities (USA) Inc. provides investment management services. The company buys and sells mutual funds, bonds, annuities, and fixed income investment products, as well as offers portfolio management, financial planning, and investment advisory services. HSBC Securities serves clients worldwide.
4. Clearing Member.

1. Interactive Brokers LLC
2. N/A
3. Interactive Brokers LLC operates as a brokerage firm. The company provides trading in forex, stocks, options, futures, fixed income, and funds. Interactive Brokers serves customers worldwide.
4. Clearing Member.

1. Ironbeam, Inc.
2. N/A
3. Ironbeam is a FCM registered with the CFTC and a member of the NFA. They provide a broad range of brokerage services to institutional and retail clients alike.
4. Clearing Member.

1. J.P. Morgan Securities LLC
2. N/A
3. J.P. Morgan Securities LLC operates as an investment management company. The company offers wealth planning, education funding, research, securities, brokerage solutions, consulting programs, and portfolio management services. J.P. Morgan Securities serves customers worldwide.
4. Clearing Member.

1. Jump Trading Futures, LLC
2. N/A
3. Jump is a proprietary trading firm with a focus on algorithmic and high-frequency trading strategies. The firm is active in futures, options, cryptocurrency, and equities markets worldwide.
4. Clearing Member.

1. Logista Clearing Corporation LLC[3]
2. N/A
3. Logista Clearing Corporation LLC is a trading firm specializing in commodity derivatives, specifically calendar spread options (CSOs) in crude oil and natural gas.
4. Clearing Member.

1. Macquarie Futures USA LLC
2. N/A
3. Macquarie Futures USA LLC engages in executing and clearing futures contracts on futures exchanges in the United States and internationally. The company is registered with the CFTC as a FCM. It provides its global futures broker services to institutional clients, commodity and energy producers, consumers and fund managers.
4. Clearing Member.

1. Marex Capital Markets Inc.
2. N/A
3. Marex Capital Markets Inc. provides financial brokerage services. The company offers trade processing, financing, clearing, execution, market making, and voice brokerage services. Marex Capital Markets serves clients worldwide.
4. Clearing Member.

1. MFI Funding LLC
2. N/A
3. MFI Funding LLC is a Delaware-based subsidiary of Millennium Fixed Income Ltd. (part of Millennium Partners, L.P.). It specializes in proprietary securities financing transactions, including repurchase and reverse repurchase agreements, supporting the broader firm's fixed income trading operations. It operates as a focused financial entity with minimal disclosed risk of loss.
4. Clearing Member.

1. Mizuho Securities USA LLC
2. N/A
3. Mizuho Securities USA LLC operates as an institutional brokerage firm. The company focuses on equity, futures clearing, execution, and fixed income products, as well as specializing in raising capital through mergers and acquisition, debt, equity underwriting, and advisory services. Mizuho Securities USA serves clients worldwide.
4. Clearing Member.

1. Montec Securities LLC
2. N/A
3. Montec Securities LLC is a private, New York-based broker dealer that primarily functions as a specialized trading and clearing arm for its ultimate parent, Capula Investment Management
4. Clearing Member.

[3] Logista Clearing Corporation LLC is not actively clearing.

1. Morgan Stanley & Co. LLC
2. N/A
3. Morgan Stanley & Co. LLC operates as an investment management company. The company offers wealth management, capital markets, investment banking, research, trading, recapitalizations, equities valuations, and financial advisory services. Morgan Stanley & Co. serves customers worldwide.
4. Clearing Member.

1. Nanhua USA LLC
2. N/A
3. Nanhua is a Chinese-owned non-bank futures brokerage firm offering comprehensive clearing services for a wide range of products across all major asset classes, including futures and options based on equity indexes, interest rates, foreign exchange, agriculture products, energy and metals.
4. Clearing Member.

1. NatWest Markets Plc
2. N/A
3. NatWest Markets Plc provides financial services. The company offers financing and risk solutions which include debt capital markets and risk management, as well as trading and flow sales that provides liquidity and risk management in rates, currencies, credit, and securitized products. NatWest Markets serves customers worldwide.
4. Clearing Member.

1. NatWest Markets Securities Inc.
2. N/A
3. NatWest Markets Securities operates as a brokerage firm. The company buys and sells securities such as stocks, bonds, mutual funds, and other investment products. NatWest Markets Securities offers risk management, customers rates, currencies, and financing products and solutions. NatWest Markets Securities serves customers worldwide.
4. Clearing Member.

1. Nomura Securities International, Inc.
2. N/A
3. Nomura Securities International, Inc. provides institutional brokerage services. The company underwrites, sells, and trades securities for clients. Nomura Securities International operates worldwide.
4. Clearing Member.

1. Nomura Securities International, Inc.
2. N/A
3. Nomura Securities International, Inc. is a New York-based, SEC-registered broker-dealer and wholly owned subsidiary of Japan's Nomura Holdings, Inc. As the core US arm of the Nomura Group, NSI provides institutional brokerage, underwriting, and, as of late 2025, investment banking services for clients. It is known for bridging Asian markets with Western capital.

4. Clearing Member.

1. Optiver Clearing LLC
2. N/A
3. Optiver is an Illinois limited liability company. The firm is wholly owned by Optiver Partnership US LP, an Illinois limited partnership.
4. Clearing Member.

1. Palafox Trading LLC
2. N/A
3. Palafox Trading LLC is a specialized financial entity that operates as a domestic broker dealer. It is primarily known for its role as a dedicated trading and financing arm for Citadel, one of the world's largest hedge funds and market makers. Palafox Trading does not serve individual investors. Instead, it provides sophisticated back-end financial services for its affiliate.
4. Clearing Member.

1. Phillip Capital Inc.
2. N/A
3. Phillip Capital Inc. operates as a brokerage firm. The company buys and sells securities such as stocks, bonds, mutual funds, and other investment products. Phillip Capital serves customers in the United States.
4. Clearing Member.

1. Plus500US Financial Services, LLC
2. N/A
3. Plus500 is a global fintech firm providing online trading services in contracts for difference (CFDs), share dealing, futures trading and options on futures. The company has subsidiaries in the UK, Cyprus, Australia, Israel, Seychelles, Singapore, Bulgaria, Estonia, the United States and Japan
4. Clearing Member

1. Proxima Clearing, LLC
2. N/A
3. Proxima Clearing, LLC is a specialized financial services firm that operates as a Clearing Member of the CME Group. Based in Houston, Texas, the firm is an affiliate of Proxima Advisors, LLC, a prominent energy-focused hedge fund and trading firm.
4. Clearing Member.

1. Quantedge Clearing (Chicago), LLC
2. N/A
3. Quantedge Clearing (Chicago), LLC is a specialized financial services firm and a registered Clearing Member of the Group. Based in Chicago, it serves as the dedicated "self-clearing" infrastructure for Quantedge Capital, a global systematic quantitative hedge fund manager.
4. Clearing Member.

1. Rabo Securities USA Inc.
2. N/A
3. Rabo Securities USA, Inc. is the institutional investment banking arm of the Dutch-based Rabobank Group. Based in New York City, it serves as the strategic bridge for North American corporations and institutional investors to access global capital markets.
4. Clearing Member.

1. RBC Capital Markets, LLC
2. N/A
3. RBC Capital Markets, LLC operates as an investment bank. The company offers public and private placement of debt and equity securities, strategic alliances, mergers and acquisitions advice, corporate finance, equity and debt underwriting, and structured and project finance. RBC Capital Markets serves customers worldwide.
4. Clearing Member.

1. R.J. O'Brien & Associates, LLC
2. N/A
3. R.J. O'Brien & Associates, LLC provides financial services. The company offers integrated risk management, dynamic interface, multiple account trading, third-party valuations, and other services. R.J. O'Brien & Associates caters its services worldwide.
4. Clearing Member.

1. Royal Bank of Canada
2. N/A
3. Santander US Capital Markets LLC provides institutional brokerage services. The company focuses on credit, rates, structured products, securities financing, debt and equity capital markets, exchange traded derivatives, and cash equities. Santander US Capital Markets serves asset managers, hedge funds, banks, pension funds, and insurance companies worldwide.
4. Clearing Member.

1. Scotia Capital (USA) Inc.
2. N/A
3. Scotia Capital (USA) Inc. offers investment banking services including securities underwriting and brokerage. The company provides corporate lending, economic research, fund management, mergers and acquisitions, as well as money market services. Scotia Capital operates worldwide.
4. Clearing Member.

1. SG Americas Securities LLC
2. N/A
3. SG Americas Securities LLC operates as an investment management company. The company offers asset management, hedge and pension funds, investment analysis,

equities, financial planning, and advisory services. SG Americas Securities serves customers worldwide.
4. Clearing Member

1. Skylar Clearing LLC
2. N/A
3. Skylar Clearing LLC is hedge fund management firm located in Houston, TX, focused on the natural gas and power markets with a mission to generate outsized, non-correlating returns.
4. Clearing Member.

1. Societe Generale
2. N/A
3. Societe Generale is a major French multinational financial services group and one of Europe's largest banks. It operates through three main pillars - French Retail Banking, International Retail Banking & Financial Services, and Global Banking & Investor Solutions - serving over 26 million clients globally.
4. Clearing Member

1. Standard Chartered Bank
2. N/A
3. Standard Chartered Bank operates as a bank. The bank provides savings accounts, loans, mortgages, credit cards, insurance, and investment services. Standard Chartered serves customers worldwide.
4. Clearing Member.

1. StoneX Financial Inc.
2. N/A
3. StoneX Financial Inc. operates as a brokerage firm. The company specializes in the business of buying and selling securities such as stocks, bonds, mutual funds, and other investment products. StoneX Financial serves customers worldwide.
4. Clearing Member.

1. Straits Financial LLC
2. N/A
3. Straits Financial LLC is a FCM fully licensed and registered with the CFTC and the NFA. The firm is located in Chicago. The firm is a subsidiary of Straits Financial Group, a boutique brokerage firm based in Singapore.
4. Clearing Member.

1. Term Commodities Inc.
2. N/A
3. Term Commodities Inc., based in Chicago and active since early 2023, operates within the specialized business services sector, focusing on the trading and management of physical or derivative commodity products. The firm is involved in navigating volatile markets to facilitate the exchange of essential, standardized raw goods.

4. Clearing Member.

1. The Bank of Nova Scotia
2. N/A
3. The Bank of Nova Scotia is a Canadian multinational banking and financial services company headquartered in Toronto, Ontario. One of Canada's Big Five banks, it is the third-largest Canadian bank by deposits and market capitalization
4. Clearing Member.

1. The Toronto-Dominion Bank
2. N/A
3. Toronto-Dominion Bank is a Canadian multinational banking and financial services corporation headquartered in Toronto, Ontario.
4. Clearing Member.

1. TradeStation Securities, Inc.
2. N/A
3. TradeStation Securities, Inc. provides online securities brokerage services. The company focuses on securities lending to small and mid-sized hedge funds and other firms. TradeStation Securities serves customers globally.
4. Clearing Member.

1. UBS Securities LLC
2. N/A
3. UBS Securities LLC operates as the investment banking division of UBS, providing investment and broker-dealer services worldwide. The company provides services such as equities sales and trading, fixed income products, and treasury products. UBS Securities offers financial services to individual and institutional investors.
4. Clearing Member.

1. Wedbush Securities, Inc.
2. N/A
3. Wedbush Securities, Inc. provides securities brokerage and investment banking services. The company offers mergers and acquisitions, valuation, leveraged and management buyouts, private placements, initial and secondary public equity offerings, fair opinions, and strategic partnerships advisory services. Wedbush Securities serves clients in the United States.
4. Clearing Member.

1. Wells Fargo Securities, LLC
2. N/A
3. Wells Fargo Securities, LLC provides investment banking services. The company offers merchant banking, purchase sale, and brokerage of securities, and advisory services. Wells Fargo Securities serves clients worldwide.
4. Clearing Member.

Exhibit H-1

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
303 PROPRIETARY TRADING, LP	Y	N	Y	N	Y	Y	Y	N	Y	N	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
3RED PARTNERS LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	
4170 TRADING, LLC	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	
800 DEERFIELD ROAD L.L.C	Y	N	Y	Y	N	N	Y	N	Y	Y	N	N	
AARDVARK MEMBERSHIP HOLDINGS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
ABCA REVERSION FUND, A SUB-FUND OF ABCA FUNDS IRELAND PLC	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
ABN AMRO CLEARING USA LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
ABN AMRO CLEARING USA LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
ACL ALTERNATIVE FUND SAC - TRADING FUND 21	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ACL ALTERNATIVE FUND SAC LIMITED - TRADING FUND 11	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ACL ALTERNATIVE FUND SAC LIMITED - TRADING FUND 37	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ACL ALTERNATIVE FUND SAC LIMITED - TRADING FUND 39	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ACL ALTERNATIVE FUND SAC LTD TRADING FUND 47	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ACL ALTERNATIVE FUND SAC LTD-TRADING FUND 26	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ADG CORPORATE LTD	Y	N	N	Y	N	Y	Y	N	N	Y	N	Y	ECM - Hold
ADM INVESTOR SERVICES INC	Y	N	N	Y	Y	Y	Y	N	N	Y	N	Y	CLEARING
ADM INVESTOR SERVICES INC	Y	N	N	Y	Y	Y	Y	N	N	Y	N	Y	CLEARING
ADVANTAGE FUTURES, LLC	Y	N	Y	N	N	Y	N	N	N	N	N	N	CLEARING
AGSF LP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
AHL ALPHA MASTER LTD	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
AKUNA TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	
[REDACTED] 1998 TRUST	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	
[REDACTED] LIMITED PARTNERSHIP (THE)	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
ALETO MARKET NEUTRAL FUND LP	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
ALISO CAPITAL LLC	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
ALLIANZ LIFE INSURANCE COMPANY OF NORTH AMERICA	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
ALPHADYNE DIVERSIFIED STRATEGIES MASTER FUND LTD	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ALPHADYNE GLOBAL RATES MASTER FUND, LTD.	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ALPHADYNE INTERNATIONAL MASTER FUND, LTD.	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ALPHAFUSION GLOBAL OPPORTUNITIES MASTER FUND ICAV-ALPHAFUSIO	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
ALPHAGREP PTE. LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
ALPHAQUEST ORIGINAL MASTER LTD	Y	N	N	Y	Y	N	Y	N	N	Y	Y	N	
ALPHATERRA FUND, L.P. - CDP SERIES	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
ALPINE GLOBAL MANAGEMENT, LLC	N	N	N	N	N	N	Y	N	Y	N	N	N	ECM - Hold
ALPINE PARTNERS (BVI), L.P.	N	N	N	N	N	N	Y	N	Y	N	N	N	ECM - Hold
AMP GLOBAL CLEARING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
AMP OPTIONS LLC	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
[REDACTED] TRUST	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST U/A/D 4/15/97	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
[REDACTED] LIVING TRUST DATED JULY 24, 2006	Y	N	Y	N	Y	N	Y	N	N	N	Y	N	
AP CAPITAL INVESTMENT LIMITED	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
AP OFFSHORE INVESTMENT FUND THREE LP	Y	N	N	Y	N	N	Y	N	N	Y	N	N	ECM - Hold
AQR ABSOLUTE RETURN MASTER ACCOUNT, L.P.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
AQR CAPITAL MANAGEMENT, LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	FAMILY OF FUNDS (MGMT. CO.)
AQR CAPITAL MANAGEMENT, LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	FAMILY OF FUNDS (MGMT. CO.)
ARB FUND MANAGEMENT LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
ARFIMA TRADING SL	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
ASL CAPITAL MARKETS INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
ASTMAX CO LTD	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
ATLAS MACRO MASTER FUND, LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
AURA CAPITAL ATLAS FUND LP	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
AUSTRALIA & NEW ZEALAND BANKING GROUP LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
AUTONOMY MASTER FUND LIMITED	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
AXON CAPITAL LLP	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
AZTECA PARTNERS LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
BANCA SERFIN, S.A.	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
BANCO BILBAO VIZCAYA ARGENTARIA, S.A.	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
BANCO BTG PACTUAL SA CAYMAN BRANCH	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
BANCO CCF BRASIL S.A.	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
BANCO DE GALICIA Y BUENOS AIRES SA	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
BANCO MERCANTIL DEL NORTE, S.A.	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
BANCO MEXICANO SA	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
BANCO SANTANDER S.A.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
BANCOMER, SA GRAND CAYMAN BEACH	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
BANK OF AMERICA CORPORATION	Y	N	N	Y	N	N	Y	N	N	Y	N	N	EQUITY MEMBER FIRM AFFILIATE
BANK OF MONTREAL	Y	N	N	N	N	Y	Y	N	N	N	N	Y	CLEARING
BARCLAYS BANK PLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	EQUITY MEMBER FIRM AFFILIATE
BARCLAYS BANK PLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	EQUITY MEMBER FIRM AFFILIATE
BARCLAYS CAPITAL INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
[REDACTED] FAMILY TRUST DTD 6/21/05	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	N	Y	Y	N	N	N	N	N	N	
BELFIUS BANK S.A.	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
BELVEDERE TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	N	
[REDACTED] REVOCABLE TRUST DATED 9/18/93	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
BGC FINANCIAL, L.P.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
BLACK EDGE GROUP LLC	Y	N	Y	Y	Y	Y	Y	N	N	N	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
BLACKBIRD ALPHA LLC SERIES 1	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
BLACKSTAIR CAPITAL LLC	Y	N	N	N	Y	N	N	N	N	N	N	N	
BLUE DIAMOND NON-DIRECTIONAL FUND LTD	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
BLUEFIN CAPITAL MANAGEMENT LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
BMO CAPITAL MARKETS CORP.	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CLEARING
BMO CAPITAL MARKETS CORP.	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CLEARING
BNP PARIBAS	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	CLEARING
BNP PARIBAS	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	CLEARING
BNP PARIBAS SECURITIES CORP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
BOCI GLOBAL COMMODITIES HOLDINGS LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	
BOERBOEL TRADING, L.P.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
BOFA SECURITIES, INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
BP TRANSTREND DIVERSIFIED FUND LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
BRAAVOS TRADING IB LLC	N	N	N	N	N	N	Y	N	Y	N	N	N	ECM - Hold
[REDACTED] TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] TRUST DATED 10/1/90	Y	N	N	Y	N	N	N	N	N	N	N	N	
BRAHMAN PURE ALPHA PTE. LTD.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
BRECKHURST TRADING FUND, LP	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
[REDACTED] LIVING TRUST DATED OCTOBER 17, 2005	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
{REDACTED] SEP IRA ACCOUNT	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
BREVAN HOWARD MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
BREVAN HOWARD MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
BREVAN HOWARD MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] TRUST DATED FEB. 26, 2004	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DATED MAY 1, 2014	Y	N	N	Y	N	N	N	N	N	N	N	N	
BRIDGEWATER PURE ALPHA TRADING COMPANY II, LTD.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
BRIDGEWATER PURE ALPHA TRADING COMPANY, LTD.	Y	N	N	Y	N	N	N	N	N	N	N	N	
BROADVIEW CAPITAL HOLDINGS, LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
BSMA LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
BSMA LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
BUDO GROUP, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST DATED 7/9/14	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
C & C TRADING, LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	ECM - Hold
C & C TRADING, LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	ECM - Hold
CADIAN MASTER FUND, LP	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
CADIAN MASTER FUND, LP	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
CANADIAN IMPERIAL BANK OF COMMERCE	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
CANADIAN IMPERIAL BANK OF COMMERCE	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
CANADIAN IMPERIAL BANK OF COMMERCE	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
CANTOR FITZGERALD & CO	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
CANTOR FITZGERALD & CO	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
CANTOR FITZGERALD & CO	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
CAPITAL FUTURES CORPORATION	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
CAPITAL FUTURES CORPORATION	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
CAPSTONE GLOBAL MASTER (CAYMAN) LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
CAPSTONE INVESTMENT ADVISORS LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	FAMILY OF FUNDS (MGMT. CO.)
CAPULA GLOBAL RELATIVE VALUE MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
CARGILL MEAT SOLUTIONS CORP	Y	N	N	Y	N	N	N	N	N	N	N	N	
CARGILL, INCORPORATED	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
CARGILL, INCORPORATED	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] 1995 TRUST DATED FEB. 17, 1995	Y	N	N	Y	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
CAVENDISH CAPITAL LIMITED	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
CENTERSTAR ASSET MANAGEMENT, LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	
CENTIVA LIBERTY STREET LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
CHARLESWORTH RESEARCH LLC	Y	N	N	N	N	Y	Y	N	N	N	N	Y	ECM - Hold
CHARLESWORTH RESEARCH LLC	Y	N	N	N	N	Y	Y	N	N	N	N	Y	ECM - Hold
CHINA MERCHANTS SECURITIES INVESTMENT MGMT (HK) CO., LTD	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	
CHS HEDGING, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	Y	CLEARING
CHS HEDGING, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	Y	CLEARING
CIBC WORLD MARKETS CORP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
CIREX LIMITED	Y	N	N	N	N	Y	N	N	N	N	N	N	ECM - Hold
CITADEL GLOBAL FIXED INCOME MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
CITADEL SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	CLEARING
CITIGROUP GLOBAL MARKETS HOLDINGS INC.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
CITIGROUP GLOBAL MARKETS INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
CITIGROUP GLOBAL MARKETS INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
CITIGROUP GLOBAL MARKETS INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
CLEAR CAPITAL GROUP, LLC	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
CLEAR STREET HOLDINGS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
[REDACTED] TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
CMZ TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	
COBALT CATTLE COMPANY LLC	N	N	N	N	N	N	Y	N	N	Y	N	N	ECM - Hold
COGNITIVE CAPITAL LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	ECM - Hold
COMMERZ MARKETS LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
COMMERZBANK AG	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
COMMERZBANK AG	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
COMMERZBANK AG	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
COMMONWEALTH BANK OF AUSTRALIA	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
COMPASS EMV LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
COMPLUS ASIA MACRO MASTER FUND LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
CONCORD FUTURES CORP.	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
CONSOLIDATED TRADING FUTURES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] TRUST, DATED MAY 16, 2002	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
CONTECH L.P.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
COOPERATIEVE RABOBANK U.A.	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
COUNTRYWIDE HOME LOANS, INC.	Y	N	N	N	N	Y	N	N	N	N	N	N	
COUNTRYWIDE HOME LOANS, INC.	Y	N	N	N	N	Y	N	N	N	N	N	N	
COUNTRYWIDE SECURITIES CORPORATION	Y	N	N	N	N	Y	N	N	N	N	N	N	
CQ SOLUTIONS LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
CRABEL FUND, L.P. CLASS EX	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	
CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CLEARING
CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CLEARING
CREDIT AGRICOLE CORPORATE AND INVESTMENT BANK	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CLEARING
CREDIT SUISSE AG	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
CROWN A GENERIX PLC - LGT DYNAMIC PROTECTION SUB-FUND	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
CROWN A GENERIX PLC - LGT RISK PREMIA SUB-FUND	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
CROWN MANAGED ACCOUNTS SPC - CROWN/CRABEL SEG PORT	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
CROWN MANAGED ACCOUNTS SPC - CROWN/FM SEGREGATED PORTFOLIO	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
CROWN MANAGED ACCOUNTS SPC - CROWN/TRANSTREND SEGREGATED	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
CROWN MANAGED ACCOUNTS SPC - CROWNQUANT MACRO 13 SEGREGATED	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
CSC ARBITRAGE GROUP LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
CSCB CORP	N	N	N	N	N	N	Y	N	Y	N	N	N	ECM - Hold
CTC HOLDINGS, L.P.	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
CURVATURE SECURITIES, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
CX HOLDCO LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	
D. E. SHAW ASYMPTOTE PORTFOLIOS, L.L.C.	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
D. E. SHAW ASYMPTOTE PORTFOLIOS, L.L.C.	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
D. E. SHAW COMPOSITE PORTFOLIOS LLC	Y	N	N	Y	N	Y	N	N	N	N	N	N	
DA VINCI DERIVATIVES B.V.	Y	N	Y	N	N	N	Y	N	Y	N	N	N	ECM - Hold
DAIWA CAPITAL MARKETS AMERICA INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
DAIWA CAPITAL MARKETS AMERICA INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
DAIWA SECURITIES CO. LTD.	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE LIVING TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] LIVING TRUST	Y	N	Y	N	Y	N	Y	N	N	N	Y	N	
DANSKE BANK A/S	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] 2015 TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DTD JUNE 21 2011	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] LIVING REVOCABLE TRUST	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DTD 10/14/2004	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST DATED 12/15/11	Y	N	Y	N	N	N	N	N	N	N	N	N	
DBS BANK LTD.	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
[REDACTED] MONEY PURCHASE PLAN & TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
DECLARATION OF TRUST OF [REDACTED]	Y	N	Y	N	N	Y	N	N	N	N	N	N	
DECLARATION OF TRUST [REDACTED] AS AMENDED	Y	N	N	N	N	Y	N	N	N	N	N	N	
DEEPFIN RESEARCH LTD	Y	N	Y	N	N	N	Y	N	Y	N	N	N	ECM - Hold
[REDACTED] 1998 TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
DEUTSCHE BANK AG	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CLEARING
DEUTSCHE BANK AG	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CLEARING
DEUTSCHE BANK SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
DEUTSCHE BANK SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
DEUTSCHE BANK SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
DEUTSCHE BANK SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
DEUTSCHE BANK SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
DG MACRO FUND LIMITED	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
DIRECT ACCESS USA LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	CLEARING
DISCUS HOLDINGS LIMITED	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
DISCUS HOLDINGS LIMITED	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
[REDACTED] LIVING TRUST DATED 9/14/92	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
[REDACTED] DECLARATION OF TRUST DATED 4-7-05	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
DOMINICE FUNDS PLC - CASSIOPEIA UCITS	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE TRUST DTD 11/10/09	Y	N	N	Y	N	N	N	N	N	N	N	N	
DORMAN TRADING, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	
DORSET NATURAL RESOURCES & COMMODITY INVESTMENT FUND LP	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] DECLARATION OF TRUST DATED MAY 5, 2004	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
DRW INVESTMENTS, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	EQUITY MEMBER FIRM AFFILIATE
DV GROUP, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
DYMON ASIA MULTI-STRATEGY INVESTMENT MASTER FUND	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
E.M. COMBS, LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	ECM - Hold
EAGLE MARKET MAKERS INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	N	CLEARING
EAGLE MARKET MAKERS INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	N	CLEARING
EAGLE MARKET MAKERS INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	N	CLEARING
EAGLE SEVEN LLC	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	
EDGEHOG LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
EDGESTREAM FUTURES AND FOREIGN EXCHANGE FUND LTD	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
EDL GLOBAL OPPORTUNITIES MASTER FUND LTD	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS

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[REDACTED] TRUST	Y	N	Y	Y	Y	N	Y	N	N	N	Y	N	
EFFICIENT ABSOLUTE RETURN	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
EFFICIENT TRADING, LTD	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
EGMF MASTER LP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
ELAN MASTER FUND LTD.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
ELEMENT CAPITAL MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
ELISE (JERSEY) LIMITED	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] TRUST DATED JANUARY 8, 1999	Y	N	Y	N	N	N	N	N	N	N	N	N	
ELK CAPITAL MARKETS UK LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	ECM - Hold
[REDACTED] JTWROS	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	
ELLIOTT ASSOCIATES L.P.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
ELLIOTT INTERNATIONAL, L.P.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] R SEP IRA	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
EPOCH CAPITAL MASTER FUND SPC ATLAS FUND MASTER SP	N	N	N	N	N	N	Y	N	Y	N	N	Y	TRADING MEMBER FIRMS
EPOCH CAPITAL MASTER FUND SPC GLOBAL PROPRIETARY MFT MASTER	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
EQUITEC GROUP, LLC	Y	N	N	N	Y	N	Y	N	N	N	Y	N	
EQUITEC PROPRIETARY MARKETS, LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	
EQVILENT INVESTMENTS LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE LIVING TRUST DATED JUNE 29, 1999	Y	N	N	Y	N	N	N	N	N	N	N	N	
ESTATE OF [REDACTED]	Y	N	N	N	N	Y	N	N	N	N	N	N	
ESTATE OF [REDACTED]	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
ESTATE OF [REDACTED]	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] 2003 REVOCABLE TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
EVERGREEN STATISTICAL TRADING	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
EXODUSPOINT PARTNERS MASTER FUND, LP	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
FEDERAL HOME LOAN MORTGAGE CORPORATION	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] TRUST DATED SEPTEMBER 2, 2004	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] CME TRUST DATED OCTOBER 3, 2007	Y	N	Y	N	N	N	N	N	N	N	N	N	
FIVE RINGS CAPITAL, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
FLOW TRADERS HOLDING B.V.	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
FNY PARTNERS FUND LP	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
FORZA FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] TRUST U/T/A DATED 10/30/97	Y	N	N	Y	Y	N	Y	N	N	Y	Y	N	
FUBON FUTURES CO LTD	Y	N	Y	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
FUTURES TRADING MASTER, L.P.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
G-20 HERMES ADVISORY LTD	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
G.H. FINANCIALS LTD	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	
G.H. FINANCIALS, LLC	N	N	N	N	N	N	Y	N	N	Y	N	N	CLEARING
GALAXY PLUS FUND ARSLAN CAPITAL FUTURES MASTER FUND 561 LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
GARDA FIRV OPPORTUNITY MASTER FUND LTD	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
GATOR TRADING PARTNERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	TRADING MEMBER FIRMS
GATOR TRADING PARTNERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	TRADING MEMBER FIRMS
GATOR TRADING PARTNERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	TRADING MEMBER FIRMS
GATOR TRADING PARTNERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	TRADING MEMBER FIRMS
GATOR TRADING PARTNERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	TRADING MEMBER FIRMS
GATOR TRADING PARTNERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	TRADING MEMBER FIRMS
GELBER GROUP, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
GENEVA TRADING OPERATIONS, LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] LIVING TRUST 6/30/94	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	
[REDACTED] DECLARATION OF TRUST DATED 9/4/90	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 6/3/09	Y	N	N	N	N	Y	N	N	N	N	N	N	
GFI SECURITIES LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST DATED AUGUST 21, 2002	Y	N	Y	N	Y	N	Y	N	N	N	Y	N	
[REDACTED] TRUST DATED 3/18/81	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	Y	
GLENVIEW CAPITAL MASTER FUND, LTD	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
GLENVIEW OFFSHORE OPPORTUNITY MASTER FUND, LTD	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
GLOBAL CURRENCY RESERVE LP	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
GLOBAL EXECUTION LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
GLOBAL SIGMA FUND LP	Y	N	Y	N	N	N	N	N	N	N	N	N	
GLOBAL VOLATILITY VOYAGEUR MASTER LTD	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
GLOBAL VOLATILITY VOYAGEUR MASTER LTD	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
GLP, LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
GMO FINANCIAL HOLDINGS INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
GOLDMAN SACHS & CO. LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
GOLDMAN SACHS & CO. LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
GOLDMAN SACHS & CO. LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
GOLDMAN SACHS FINANCIAL MARKETS L.P.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
GOVPLUS FUND AI LP	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
GP INVESTMENTS LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
GQ2 FUND, LP	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
GRAHAM COMMODITY STRATEGIES LLC	Y	N	Y	Y	N	N	Y	N	Y	Y	N	N	
GRAHAM K4D TRADING LTD.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
GRAHAM MACRO STRATEGIC LTD	Y	N	N	Y	N	Y	Y	N	N	Y	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
GRAHAM QM TRADING LLC	Y	N	Y	Y	Y	N	Y	N	Y	Y	Y	N	
GRAHAM USQMN LTD	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] FAMILY TRUST	Y	N	Y	Y	N	N	Y	N	Y	Y	N	N	
[REDACTED] TRUST AGREEMENT DATED 5/15/00	Y	N	Y	N	N	N	N	N	N	N	N	N	
GRESSEL PRODUCE AND COMMODITIES LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE LIVING TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
GRUPO ORICTEROPO TROPICAL LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
GSA INTERNATIONAL MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
GSA QMS MASTER FUND LIMITED	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
GTS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
HAP TRADING LLC	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
HARD EIGHT FUTURES, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
HARRIOT DMCC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
HBK MASTER FUND L.P.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
HEADLANDS TECHNOLOGIES LLC	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
HEADLANDS TECHNOLOGIES LLC	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
HERTSHTEN GROUP LIMITED	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
HERTSHTEN GROUP LIMITED	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
HGC TRADING, LLC ELECTRONIC SERIES	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
HIDDEN ROAD PARTNERS CIV US LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
HOLOCENE ADVISORS MASTER FUND LTD.	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] LIVING TRUST DATED MAY 25, 2010	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 10/28/08	Y	N	Y	N	Y	N	Y	N	Y	N	N	N	
HRT FINANCIAL LP	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
HSBC BANK PLC	Y	N	N	N	N	Y	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
HSBC BANK USA NATIONAL ASSOCIATION	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
HSBC BANK USA NATIONAL ASSOCIATION	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
HSBC BANK USA NATIONAL ASSOCIATION	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
HSBC SECURITIES (USA) INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
HSBC SECURITIES (USA) INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
HUA NAN FUTURES CO., LTD.	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
HUGHES & COMPANY LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
IKOS-RADIAN DIVERSIFIED LIMITED	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
IMC B.V.	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
IMC B.V.	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
IMC CHICAGO, LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	
IMC SECURITIES LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
IMPEROS TRADING LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	ECM - Hold
INTERACTIVEE BROKERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	CLEARING
INTERACTIVEE BROKERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	CLEARING
INTERACTIVEE BROKERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	CLEARING
INTERACTIVEE BROKERS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	CLEARING
[REDACTED] LIVING TRUST	Y	N	Y	N	Y	Y	Y	N	Y	N	Y	N	
[REDACTED] TRUST DATED 8/15/96	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
J. ARON & COMPANY LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	EQUITY MEMBER FIRM AFFILIATE
J. ARON & COMPANY LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	EQUITY MEMBER FIRM AFFILIATE
J. ARON & COMPANY LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	EQUITY MEMBER FIRM AFFILIATE
J. C. CAPITAL MANAGEMENT GROUP CORPORATION	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
JACKSON NATIONAL LIFE INSURANCE COMPANY	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
JAIN GLOBAL MASTER FUND LTD	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
JAIN TRADING STRATEGIES, LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] 2014 TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] PROFIT SHARING PLAN	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] AS TENANTS IN COMMON	Y	N	N	Y	N	Y	N	N	N	N	N	N	
[REDACTED] AS TENANTS IN COMMON	Y	N	N	Y	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST DATED JUNE 28, 1993	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] TRUST DATED JUNE 5, 2003	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST, DATED JANUARY 25, 1993	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] FAMILY TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
[REDACTED] REVOCABLE LIVING TRUST DATED JANUARY 19 2007	Y	N	N	Y	N	N	N	N	N	N	N	N	
JANE STREET CAPITAL, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST DATED SEPTEMBER 16, 1992	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
JEFFERIES LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
JEFFERIES LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
JEFFERIES LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
JEFFERIES LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
[REDACTED] LIVING TRUST UAD 5/23/02	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED AUG. 22, 2002	Y	N	N	N	N	Y	N	N	N	N	N	N	
JETWAY TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST DTD 1/28/93	Y	N	Y	N	N	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST DATED 7/25/94	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] LIVING TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] LIVING TRUST	Y	N	Y	N	Y	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST OF 2017	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	
[REDACTED] TRUST DATED 7/25/00	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 1/4/12	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED 10/21/92	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST DATED 3/24/00	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
JOHN HANCOCK LIFE INSURANCE COMPANY (U.S.A.)	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
JOHN HANCOCK LIFE INSURANCE COMPANY OF NEW YORK	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] LIFE INSURANCE TRUST AGREEMENT DATED 9/5/84	Y	N	Y	N	N	Y	Y	N	Y	N	N	N	
[REDACTED] TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED JANUARY 12, 2006	Y	N	Y	N	N	N	N	N	N	N	N	N	
JOHN STREET SYSTEMATIC MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] DECLARATION OF TRUST DATED 9/19/95	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] TRUST DATED 11/19/08	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] REVOCABLE TRUST DATED 1/16/94	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] LIVING TRUST DATED 10/9/2014	Y	N	N	N	N	Y	N	N	N	N	N	N	
JP MORGAN SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
[REDACTED] REVOCABLE LIVING TRUST DATED 5/13/08	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	
[REDACTED] REVOCABLE TRUST DATED 12/14/00	Y	N	N	N	N	Y	N	N	N	N	N	N	
JUMP TRADING FUTURES LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	CLEARING
JUMP TRADING FUTURES LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	CLEARING
[REDACTED] MARITAL TRUST	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	
KAISER TRADING GROUP PTY LTD	Y	N	Y	N	N	N	N	N	N	N	N	N	
KALEIDOSCOPE FRACTAL MASTER FUND LP	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
KALEIDOSCOPE PRISM MASTER FUND LP	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
KAPITALO INTERNATIONAL FUND SPC - SEGREGATED PORTFOLIO K	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST DATED 5/20/92	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
KEDALION FUND LP	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] TRUST AGREEMENT DATED 10/1/93 OR HIS SUCCE	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] LIVING TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
KEPOS ALPHA MASTER FUND LP	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
KERSHNER EQUITIES LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
KEYSTONE TRADING CORPORATION	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	
KGI FUTURES CO., LTD.	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
KHAWK CAPITAL LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	ECM - Hold
KIOSK INC.	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DATED APRIL 20, 2009	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	
KIRKOSWALD GLOBAL MACRO MASTER FUND LTD	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
KORE TRADING LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
KSMASL INVESTMENTS LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
LAND O' LAKES, INC.	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
LANDESBANK BADEN-WURTTEMBERG	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE TRUST DTD 10/27/00	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] 1989 TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED 4/29/08	Y	N	N	N	N	Y	N	N	N	N	N	N	
LAURION CAPITAL MASTER FUND LTD	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
LAURION CAPITAL MASTER FUND LTD	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
LDFA LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] DECLARATION OF TRUST DTD 3/29/10	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST UNDER AGREEMENT DATED NOVEMBER 1	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
LFG (ASIA) LIMITED	Y	N	N	N	Y	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED 1/29/2020	Y	N	Y	Y	N	N	N	N	N	N	N	N	
LIGER INVESTMENTS LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
LIGER INVESTMENTS LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
LIGER INVESTMENTS LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
LIMINALITY PARTNERS LP	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
LION ROCK LTD	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
LIVING TRUST AGREEMENT OF [REDACTED] DATED SEPTEMBER 28,	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
LMR ALPHA RATES TRADING MASTER FUND LIMITED	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
LMR MULTI STRATEGY MASTER FUND LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
LOCORR FUTURES PORTFOLIO FUND LP	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] DECLARATION OF TRUST DATED JULY 25, 1996	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
[REDACTED] REVOCABLE TRUST	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	Y	Y	N	Y	N	N	N	N	N	N	
LORRAYNE, LTD	Y	N	Y	N	Y	Y	Y	N	Y	N	Y	Y	
LOUIS DREYFUS COMPANY LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] DECLARATION OF TRUST DATED DECEMBER 21, 2	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
LTG LASALLE INVESTMENTS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] TRUST DATED 12/27/91	Y	N	N	Y	N	N	N	N	N	N	N	N	
LUPO HOLDING COMPANY LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
LUPO HOLDING COMPANY LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
LYNX MASTER (CAYMAN) LTD.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
M&N TRADING, LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	
M&N TRADING, LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	
MA CAPITAL LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MACQUARIE FUTURES USA LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CLEARING
MAKO GLOBAL DERIVATIVES PARTNERSHIP LLP	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
MANUFACTURERS LIFE REINSURANCE LIMITED	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MAP 240 SEGREGATED PORTFOLIO	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
MAREX CAPITAL MARKETS INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
MAREX GROUP PLC	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	
[REDACTED] TRUST AGREEMENT DATED 4/7/04	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] FAMILY TRUST	Y	N	Y	Y	N	N	Y	N	Y	Y	N	N	
[REDACTED] REVOCABLE TRUST DTD APRIL 7, 1995	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST DATED 11/15/01	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] LIVING TRUST, DATED AUGUST 7, 2001	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
MARSHALL WACE INVESTMENT STRATEGIES EUREKA FUND	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
MARSHALL WACE INVESTMENT STRATEGIES MARKET NEUTRAL TOPS FUND	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
MARSHALL WACE INVESTMENT STRATEGIES TOPS FUND	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
MARSHALL WACE MASTER FUNDS SPC - SP ALPHA PLUS FUND	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
[REDACTED] FAMILY TRUST U/A/D 12/5/77	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED 8/10/82	Y	N	Y	N	N	Y	Y	N	Y	N	N	N	
[REDACTED] FAMILY TRUST	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
[REDACTED] AMENDED AND RESTATED REVOCABLE TRUST DATED	Y	N	Y	N	Y	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST II DATED JANUARY 25, 2002	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
MASSAR MACRO COMMODITY MASTER FUND, LTD.	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
MASTERLINK FUTURES CORPORATION	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] PROFIT SHARING PLAN TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
MAUNA KEA FINANCIAL MANAGEMENT, INC.	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
MAVEN EUROPE LTD.	Y	N	N	N	N	Y	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
MAVEN GLOBAL MARKETS TRADING LLP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] 2020 IRREVOCABLE TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	N	
MBF TRADING, LLC	N	N	N	N	N	N	Y	N	N	Y	N	N	ECM - Hold
MBF TRADING, LLC	N	N	N	N	N	N	Y	N	N	Y	N	N	ECM - Hold
MEB INVESTMENTS LLC	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
MERUS GLOBAL INVESTMENTS, LLC	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
METLIFE REINSURANCE COMPANY OF BERMUDA, LTD.	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
METROPOLITAN LIFE INSURANCE COMPANY	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
MFI FUNDING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
[REDACTED] TRUST DTD 10/13/10	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DTD 12/24/1999	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST DATED 5/25/83	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] TRUST DATED 12/14/10	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED MARCH 24, 1986	Y	N	Y	N	N	Y	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
MID-TM LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MIDLAND NATIONAL LIFE INSURANCE COMPANY	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
MIDLAND TRUST COMPANY AS CUSTODIAN FBO [REDACTED]	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
MILLENNIUM PARTNERS, L.P.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MILLENNIUM PARTNERS, L.P.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MILLENNIUM PARTNERS, L.P.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MILLENNIUM PARTNERS, L.P.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MILLENNIUM PARTNERS, L.P.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MIRAE ASSET SECURITIES (USA) INC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] TRUST AND BANKING CORPORATION	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
MIZUHO FINANCIAL GROUP INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MIZUHO INTERNATIONAL PLC	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
MIZUHO SECURITIES CO LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MIZUHO SECURITIES USA LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	CLEARING
MIZUHO SECURITIES USA LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	CLEARING
MKP ALPHA PORT, LTD.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MKP ENHANCED OPPORTUNITY MASTER FUND, LTD.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MKS PAMP SA	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
MKS PAMP SA	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MODULAR ASIAN MACRO MASTER FUND LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MOLECULE MASTER LP	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] DECLARATION OF TRUST DTD 8/11/98	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] LIVING TRUST	Y	N	N	N	Y	N	N	N	N	N	N	N	
MONTEC SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
MONTLAKE UCITS PLATFORM ICAV - CRABEL GEMINI UCITS FUND	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
MOORE GLOBAL INVESTMENTS, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MORGAN STANLEY	Y	N	N	N	N	Y	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
MORGAN STANLEY & CO. LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	Y	CLEARING
MORGAN STANLEY CAPITAL GROUP INC.	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
MOROSS LIMITED PARTNERSHIP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
MOROSS LIMITED PARTNERSHIP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] JTWROS	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	
MUFG BANK, LTD.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
MUFG BANK, LTD.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
MUFG BANK, LTD.	Y	N	N	Y	N	N	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
MUFG BANK, LTD.	Y	N	N	Y	N	N	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
MUFG BANK, LTD.	Y	N	N	Y	N	N	N	N	N	N	N	N	EQUITY MEMBER FIRM AFFILIATE
N3S3 LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	ECM - Hold
[REDACTED] FAMILY TRUST	Y	N	Y	N	Y	Y	N	N	N	N	N	N	
[REDACTED] LIVING TRUST DATED 12/22/97	Y	N	Y	N	N	N	N	N	N	N	N	N	
NANHUA USA, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
NATIONAL BANK OF CANADA	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
NATIXIS S.A.	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
NATWEST MARKETS PLC	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CLEARING
NATWEST MARKETS SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
NATWEST MARKETS SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
[REDACTED] FAMILY TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
NEW HOLLAND TACTICAL ALPHA FUND LP	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
NEWTON CAPITAL PARTNERS, L.P.	Y	N	Y	N	N	N	N	N	N	N	N	N	ECM - Hold
NFE LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
NICHE PLUS MASTER FUND LTD	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
NINJATRADER CLEARING LLC	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	Y	
[REDACTED] TRUST DATED MAY 11, 1998	Y	N	N	N	N	Y	N	N	N	N	N	N	
NOMURA SECURITIES INTERNATIONAL, INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
NOMURA SECURITIES INTERNATIONAL, INC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
NOMURA SECURITIES INTERNATIONAL, INC.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
NOMURA SECURITIES INTERNATIONAL, INC.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
NORTH AMERICAN COMPANY FOR LIFE AND HEALTH INSURANCE	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
NORTHERN TRUST COMPANY	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
O'CONNOR SEATS LLC	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	Y	
OANDA AUSTRALIA PTY LTD	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
OANDA AUSTRALIA PTY LTD	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
OLD MISSION GROUP LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
OMNI POINT CAPITAL, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
OPTIVER TRADING US LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	
OPTIVER US, LLC	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	EQUITY MEMBER FIRM AFFILIATE
OPTIVER V.O.F.	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
ORION NEBULA INC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	ECM - Hold
OVERSEA-CHINESE BANKING CORPORATION LIMITED	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
OWL CREEK II, L.P.	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
OWL CREEK OVERSEAS MASTER FUND, LTD.	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
PAL PROPERTIES II, L.P.	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
PALOMINO MASTER LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
PANIMA CAPITAL SPC - PANIMA 1	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
PARALLAX MASTER FUND LP	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE TRUST DTD 06-22-04	Y	N	N	N	N	Y	N	N	N	N	N	N	

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
[REDACTED] TRUST DATED 7/25/95	Y	N	Y	N	N	N	N	N	N	N	N	N	
PATRONUS CAPITAL, LP	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] DECLARATION OF TRUST DATED SEPTEMBER 10, 200	Y	N	Y	Y	N	N	Y	N	Y	Y	N	N	
PDT PARTNERS PORTFOLIO III, LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
PDT PARTNERS PORTFOLIO III, LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
PENTIMON LIMITED	N	N	N	N	N	N	Y	N	N	Y	N	N	ECM - Hold
[REDACTED] REVOCABLE TRUST AGREEMENT DATED 1/22/08	Y	N	Y	Y	N	N	N	N	N	N	N	N	
[REDACTED] LIVING TRUST DATED 5/14/92	Y	N	N	N	Y	N	Y	N	N	N	Y	N	
[REDACTED] TRUST DATED 2/13/93	Y	N	N	N	N	Y	N	N	N	N	N	N	
PHILLIP CAPITAL INC.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CLEARING
PHILLIP SECURITIES PTE LTD	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
PLUS500US FINANCIAL SERVICES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
PNC BANK, N.A.	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
PNT FINANCIAL LLC	Y	N	Y	N	N	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
POINT72 STRATEGIC INVESTMENTS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
POINT72 STRATEGIC INVESTMENTS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
POLAR MULTI STRATEGY MASTER FUND	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
PORT 22 LLC	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	
PRAXIS OPPORTUNITY FUND, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	TRADING MEMBER FIRMS
PRESIDENT FUTURES CO LTD	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
PRIME TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
PURPLESIGMA TRADING PTE LTD	Y	N	Y	N	N	N	Y	N	Y	N	N	N	ECM - Hold
QRT MASTER FUND SPC TORUS FUND SP	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
QUANTEDGE CLEARING (CHICAGO) LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
QUANTIQ TECHNOLOGIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
QUANTITATIVE INVESTMENT MANAGEMENT, LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	
QUANTRES ASSET MANAGEMENT LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	SUB-ACCOUNTING
QUANTRES ASSET MANAGEMENT LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	SUB-ACCOUNTING
QUANTRES ASSET MANAGEMENT LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	SUB-ACCOUNTING
QUANTUM PARTNERS LP	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
QUANTUM PARTNERS LP	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
QUARTYS LIMITED	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
QUBE MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
R.J. O'BRIEN & ASSOCIATES, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	CLEARING
R.J. O'BRIEN & ASSOCIATES, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	N	CLEARING
R2 INVESTMENTS LTD.	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
RADIX TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST DATED MARCH 17, 2006	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
RAMGUARD LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] TRUST DATED 10/4/96	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
RBC CAPITAL MARKETS LLC	Y	N	N	Y	Y	Y	Y	N	N	Y	Y	Y	CLEARING
RBC CAPITAL MARKETS LLC	Y	N	N	Y	Y	Y	Y	N	N	Y	Y	Y	CLEARING
RBC CAPITAL MARKETS LLC	Y	N	N	Y	Y	Y	Y	N	N	Y	Y	Y	CLEARING
RC FAMILY FARMS, INC.	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
RCG HOLDINGS, LLC	Y	N	N	N	Y	N	N	N	N	N	N	N	
READYSTATE MASTER FUND LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] D/T/D 3/1/89 AS AMENDED	Y	N	Y	N	Y	Y	Y	N	Y	N	N	N	
REFINOVA CAPITAL LP	N	N	N	N	N	N	Y	N	Y	N	N	N	ECM - Hold
RHINEGOLD LTD.	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] DECLARATION OF TRUST DATED 3/5/09	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST DATED JUNE 28, 2001	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] TRUST DATED OCTOBER 11, 1985	Y	N	Y	N	N	N	N	N	N	N	N	N	
RIGEL COVE LP	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
RIGHT TRACK TRADING LIMITED	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
RIO VALORES S A SOCIEDAD DE BOLSA	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
RIVERVIEW OMNI MASTER FUND LP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
RIVERWOODS PROP, LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
RJL PARTNERS	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 11/14/97	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] TRUST DATED 2/25/85	Y	N	Y	N	N	Y	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 12/19/14	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	
[REDACTED] LIVING TRUST U/T/A DTD 4/9/04	Y	N	Y	N	N	N	N	N	N	N	N	N	
ROC TECH PTE LTD	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
ROKOS GLOBAL MACRO MASTER FUND LP	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] LIVING TRUST DTD 1-26-2010	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 8/29/91	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
ROYAL BANK OF CANADA	Y	N	N	N	N	Y	Y	N	N	N	N	Y	CLEARING
RQSI GLOBAL ASSET ALLOCATION MASTER FUND LLC	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
RSJ PROP SICAV A.S.- RSJ PROP PODFOND	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
S.P. BECKER L.P.	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
SABA CAPITAL MASTER FUND, LTD.	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
SAFFRON TRADING GROUP, LLC	Y	N	N	N	Y	N	Y	N	N	N	Y	N	
SAFFRON TRADING GROUP, LLC	Y	N	N	N	Y	N	Y	N	N	N	Y	N	
[REDACTED] REVOCABLE TRUST DATED JUNE 9, 2000	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] TRUST DATED 1/13/97	Y	N	Y	N	N	Y	Y	N	N	N	N	Y	
SAVINOTHREE, LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
SAXO BANK A/S	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
SCHONFELD STRATEGIC MANAGEMENT LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	FAMILY OF FUNDS (MGMT. CO.)
SCOTIA CAPITAL (USA) INC.	Y	N	Y	Y	Y	Y	Y	N	N	N	Y	Y	CLEARING
SCOTIA CAPITAL (USA) INC.	Y	N	Y	Y	Y	Y	Y	N	N	N	Y	Y	CLEARING
[REDACTED] LIVING TRUST DTD. AUGUST 16, 2006	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] DECLARATION OF TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
SCULPTOR MASTER FUND, LTD.	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
SG AMERICAS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CLEARING
SG AMERICAS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CLEARING
SG AMERICAS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CLEARING
SGCT LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	ECM - Hold
SHARADA HOLDINGS, LLC	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
[REDACTED] TRUST AGREEMENT DATED JULY 16, 2008	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] ESTATE TRUST DATED AUGUST 5, 2008	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	
SIMPLEX TRADING, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SINOPAC FUTURES CORPORATION	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
SKTY ASSET MANAGEMENT L.L.C.	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y	Y	
SKTY TRADING L.L.C.	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
SMITHFIELD FOODS, INC.	Y	N	N	Y	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
SOCIETE GENERALE	Y	N	N	Y	N	N	Y	N	N	Y	N	N	CLEARING
SOCIETE GENERALE	Y	N	N	Y	N	N	Y	N	N	Y	N	N	CLEARING
SOROS CAPITAL LP	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
SOSTRIN LIMITED PARTNERSHIP	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
SOUTHERN RIDGES SUMMIT MASTER MACRO FUND	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
SQUAREPOINT MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SQUAREPOINT OPS LLC	Y	N	N	Y	N	N	N	N	N	N	N	N	FAMILY OF FUNDS (MGMT. CO.)
STANDARD CHARTERED BANK	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CLEARING
STANDARD CHARTERED BANK	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CLEARING
STANDARD CHARTERED BANK	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CLEARING
STANDARD CHARTERED BANK	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CLEARING
STATAR CAPITAL PARTNERS LP	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
[REDACTED] DECLARATION OF TRUST DATED JULY 15, 1998	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 5-18-2001	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] REVOCABLE TRUST DATED 6/22/04	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
STONEX FINANCIAL INC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	CLEARING
STONEX FINANCIAL INC	Y	N	Y	Y	Y	Y	Y	N	Y	N	N	N	CLEARING
STRAITS FINANCIAL LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
STRAITS FINANCIAL LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
STRATUS MASTER LIMITED	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
STRATUS MASTER LIMITED	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SUMITOMO MITSUI BANKING CORPORATION	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
SUMITOMO MITSUI BANKING CORPORATION	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
SUMITOMO MITSUI TRUST BANK LIMITED	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
SUMMIT SECURITIES GROUP LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	Y	TRADING MEMBER FIRMS
SUMO CAPITAL, LLC	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
SUNRISE FUTURES, LLC	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SUNRISE FUTURES, LLC	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SUNRISE PARTNERS LIMITED PARTNERSHIP	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
SUNRISE PARTNERS LIMITED PARTNERSHIP	N	N	N	N	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
[REDACTED] DECLARATION OF TRUST U/A DTD. 11/21/2006	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] TRUST	Y	N	N	N	Y	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE LIVING TRUST, DATED SEPTEMBER 26, 20	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
SUSQUEHANNA CLEARING, LLC	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SUSQUEHANNA CLEARING, LLC	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SUSQUEHANNA CLEARING, LLC	Y	N	N	Y	N	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SUSQUEHANNA INVESTMENT GROUP	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
SUVRETTA MASTER FUND, LTD.	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
SVLSCAPITAL, LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
SWISS RE FINANCIAL MARKETS CORPORATION	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] LIVING TRUST	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
SYMMETRY ADAPTIVE FUND LTD	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
SYMMETRY FINANCIALS LTD	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SYMMETRY MASTER FUND LIMITED	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
SYSTEMATIC TRADING ASSOCIATES PTY LTD	Y	N	N	N	N	Y	Y	N	N	N	N	Y	ECM - Hold
SYSTEMATICA BLUETREND MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
SYSTEMATICA BLUETREND MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
T3 GLOBAL TRADING LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
TAIWAN INTERNATIONAL FUTURES CORP	Y	N	N	N	Y	N	N	N	N	N	N	N	GEM INSTITUTIONAL ACCESS FIRM
TANIUS TECHNOLOGY LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE TRUST DATED MAY 4, 1998	Y	N	Y	N	N	N	N	N	N	N	N	N	
TAULA MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
TB MCG INVESTMENTS LLC	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
TD SECURITIES (USA) LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] SELF-DECLARATION OF TRUST DATED 10/13/93	Y	N	N	Y	Y	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	N	
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
TEWKSBURY FUTURES FUND LTD.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	
TEWKSBURY INVESTMENT FUND LTD.	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
TEWKSBURY INVESTMENT FUND LTD.	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
THE BANK OF NEW YORK MELLON	Y	N	N	N	N	Y	N	N	N	N	N	N	
THE BANK OF NEW YORK MELLON	Y	N	N	N	N	Y	N	N	N	N	N	N	
THE BANK OF NOVA SCOTIA	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
[REDACTED] DECLARATION OF TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
THE [REDACTED] TRUST	Y	N	N	Y	Y	N	Y	N	N	N	Y	N	
THE [REDACTED] FAMILY TRUST DATED 11/11/11	Y	N	Y	Y	Y	N	Y	N	Y	Y	N	N	
THE CASSIOPEIA FUND	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
THE ESTATE OF [REDACTED]	Y	N	Y	N	N	N	N	N	N	N	N	N	
THE ESTATE OF [REDACTED]	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
THE ESTATE OF [REDACTED]	Y	N	N	N	Y	N	Y	N	N	N	Y	N	
THE ESTATE OF [REDACTED]	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
THE ESTATE OF [REDACTED]	Y	N	Y	N	N	N	N	N	N	N	N	N	
THE ESTATE OF [REDACTED]	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
THE [REDACTED] FAMILY DECLARATION OF TRUST	Y	N	Y	N	N	N	N	N	N	N	N	N	
THE GRASSHOPPER FUND VCC GRASSHOPPER QUANT MULTI STRATEGY FU	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
THE HYPERION FUND LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
THE [REDACTED] TRUST DATED 1/6/12	Y	N	N	N	N	Y	N	N	N	N	N	N	

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
THE [REDACTED] LIVING TRUST DATED 8/4/09	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
THE [REDACTED] FAMILY TRUST DATED 3/16/98	Y	N	Y	N	N	N	N	N	N	N	N	N	
THE MANUFACTURERS LIFE INSURANCE COMPANY	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
THE MASCHHOFFS, LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
THE [REDACTED] UNDER THE [REDACTED] LIVING TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] REVOCABLE TRUST DATED MAR 22, 1998	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
THE MULTI ASSET VOLATILITY CAPTURE FUND LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE TRUST	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	
THE STANDARD BANK OF SOUTH AFRICA LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
THE TORONTO- DOMINION BANK	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE FAMILY TRUST U/A/D/ 8/11/05	Y	N	Y	N	N	N	N	N	N	N	N	N	
THE WINTON MASTER FUND LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] LIVING TRUST 3/22/94	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST AGREEMENT	Y	N	N	N	N	Y	N	N	N	N	N	N	
[REDACTED] REVOCABLE TRUST DATED 5/1/96	Y	N	Y	N	N	N	N	N	N	N	N	N	
TIANYOU FUND, L.P.	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
TILT TRADING LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	ECM - Hold
[REDACTED] TRUST DATED NOVEMBER 1, 1999	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED OCT. 11, 2004	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
TJM INVESTMENTS, LLC	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
[REDACTED] LIVING TRUST DTD 2/26/07	Y	N	Y	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST UNDER DECLARATION OF TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
TOWER RESEARCH CAPITAL INVESTMENTS LLC	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
TRADELINK L.L.C.	Y	N	Y	N	Y	Y	Y	N	Y	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
TRADESTATION SECURITIES, INC.	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CLEARING
TRANSTREND FUND ALLIANCE SICAV - OMNITREND	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
TRANSTREND FUND ALLIANCE SICAV - OMNITREND PLUS	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
TRUST A C/U [REDACTED] FAMILY TRUST	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
TRUST AGREEMENT OF [REDACTED]	Y	N	N	N	Y	N	Y	N	N	N	Y	N	
TRUST B C/U [REDACTED] FAMILY TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
TS TFD BUYER LLC	N	N	N	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS
TUDOR FAMILY FUND II LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
TUDOR INVESTMENT CORPORATION	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
TULIP TREND FUND LTD	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
TW & RW MANAGEMENT, LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	
TWINBEECH CAPITAL LP	Y	N	N	N	N	Y	Y	N	N	N	N	Y	
TWO SIGMA INVESTMENTS LP	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	Y	
TWO SIGMA INVESTMENTS, LP	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	FAMILY OF FUNDS (MGMT. CO.)
TWO SIGMA SECURITIES, LLC	Y	N	Y	Y	Y	Y	Y	N	N	N	N	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
TYLER CAPITAL LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
TYLESWORTH LIMITED	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
TYSON FRESH MEATS INC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	TRADING MEMBER FIRMS
UBS AG	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
UBS AG	Y	N	N	N	N	Y	Y	N	N	N	N	Y	EQUITY MEMBER FIRM AFFILIATE
UBS FINANCIAL SERVICES INC.	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	Y	
UBS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
UBS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
UBS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
UBS SECURITIES LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
UNICREDIT BANK GMBH	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
[REDACTED] REVOCABLE TRUST U/A/D 2/10/92	Y	N	Y	N	N	Y	Y	N	N	N	N	Y	
VALKYRIE TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
VANAHEIM SECURITIES LLC	Y	N	Y	N	N	N	Y	N	Y	N	N	N	EQUITY MEMBER FIRM AFFILIATE
VARCAP SPC - VARIANCE FUND SEGREGATED PORTFOLIO	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
VARCAP SPC - VARIANCE FUND SEGREGATED PORTFOLIO	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
VATIC FUND I, LLC	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
VECTOR TRADING LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
VEGASOUL OPUS FUND SPC - HIGH STREET SEGREGATED PORTFOLIO	Y	N	Y	N	N	N	N	N	N	N	N	N	TRADING MEMBER FIRMS
VELOCITY TRADE LIMITED	Y	N	Y	N	N	N	Y	N	Y	N	N	N	TRADING MEMBER FIRMS

NAME	OWNS CME EXCHANGE SEAT	OWNS FRA DIVISION SEAT	OWNS IOM DIVISION SEAT	OWNS CME DIVISION SEAT	OWNS GEM DIVISION SEAT	OWNS IMM DIVISION SEAT	HOLDS CME EXCHANGE SEAT	HOLDS FRA DIVISION SEAT	HOLDS IOM DIVISION SEAT	HOLDS CME DIVISION SEAT	HOLDS GEM DIVISION SEAT	HOLDS IMM DIVISION SEAT	EXCHANGE FIRM TYPE AT CME
VERITION MULTI STRATEGY MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
VERITION MULTI STRATEGY MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE LIVING TRUST DATED 10/28/95	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
VIRTU AMERICAS LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	
VIRTU FINANCIAL OPERATING LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
VIRTU FINANCIAL OPERATING LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
VIRTU FINANCIAL OPERATING LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
VIRTU FINANCIAL OPERATING LLC	Y	N	Y	N	N	N	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
VIRTU GETCO LLC	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
W.H. TRADING L.L.C.	Y	N	Y	Y	N	Y	Y	N	Y	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
W.H. TRADING L.L.C.	Y	N	Y	Y	N	Y	Y	N	Y	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
WAKEFIELD SECURITIES LLC	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
WAKELAND SECURITIES LP	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
[REDACTED] DECLARATION OF TRUST DATED 12/8/00	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
WALLEYE OPPORTUNITIES MASTER FUND LTD	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] TRUST	Y	N	N	Y	N	N	N	N	N	N	N	N	
WAPSOG HOLDINGS LLC	Y	N	Y	N	N	Y	Y	N	Y	N	N	Y	
WEDBUSH SECURITIES INC.	Y	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	CLEARING
WEINBAUM INVESTMENTS, LLC	Y	N	Y	N	N	Y	Y	N	Y	N	N	N	
WELLS FARGO SECURITIES, LLC	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CLEARING
WELTON GLOBAL CAPITAL MARKETS FUND LIMITED - CLASS G	Y	N	N	N	N	Y	N	N	N	N	N	N	TRADING MEMBER FIRMS
WELWING MASTER FUND	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
WESTPAC BANKING CORPORATION	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
WHITE OAK CURRENCY FUND	Y	N	N	N	N	Y	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
WHITNEY CAPITAL SERIES FUND LLC	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
WIKLUND TRADING LLC	Y	N	Y	Y	Y	Y	Y	N	N	Y	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
[REDACTED] REVOCABLE LIVING TRUST	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] LIVING TRUST U/T/A/D APRIL 21, 2005	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] TRUST DTD. DEC. 10, 1981	Y	N	N	Y	N	N	Y	N	N	Y	N	N	
[REDACTED] DECLARATION OF TRUST AS AMENDED AND	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED 9/21/10	Y	N	Y	N	N	N	Y	N	Y	N	N	N	
[REDACTED] DECLARATION OF TRUST 5/19/98	Y	N	N	Y	N	N	N	N	N	N	N	N	
[REDACTED] PER DECLARATION DATED JANUARY 24, 2008	Y	N	Y	N	N	N	N	N	N	N	N	N	
[REDACTED] TRUST DATED APRIL 28, 2008	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	N	
[REDACTED] LIVING TRUST	Y	N	Y	Y	Y	Y	Y	N	Y	N	Y	N	
WIN FALL, LLC	Y	N	N	N	N	Y	N	N	N	N	N	N	
WINTON CAPITAL MANAGEMENT LIMITED	Y	N	N	Y	N	N	Y	N	N	Y	N	N	FAMILY OF FUNDS (MGMT. CO.)
WOLVERINE HOLDINGS, LP	Y	N	N	Y	Y	N	Y	N	N	Y	Y	N	CORPORATE EQUITY MEMBER FIRM (CEM)
WVP EMERGING MANAGER ONSHORE FUND LLC MULTI STRATEGY SERIES	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
XANTIUM PARTNERS L.P.	Y	N	Y	Y	N	Y	Y	N	Y	Y	N	Y	
XR GROUP LLC	Y	N	Y	Y	Y	Y	N	N	N	N	N	N	CORPORATE EQUITY MEMBER FIRM (CEM)
XTX MARKETS TRADING LIMITED	Y	N	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	CORPORATE EQUITY MEMBER FIRM (CEM)
YUANTA FUTURES CO., LTD.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
YUANTA FUTURES CO., LTD.	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS
ZENITH FUND 1 LP	N	N	N	N	N	N	Y	N	N	N	N	Y	TRADING MEMBER FIRMS

Chicago Mercantile Exchange Inc.
Form 1-N
Exhibit I

EXHIBIT I

Exhibit Request:

Provide a schedule of the security futures products proposed to be listed by the filing exchange, or for amendments to the Form 1-N the security futures products listed by the exchange, indicating for each the name of the issuer and a description of the security.

Response:

CME plans to list cash-settled security futures contracts on individual equity securities (which may include ETF securities) pursuant to listing standards and terms and conditions rules that it will file with the SEC in accordance with Section 19(b)(7) of the Exchange Act. CME currently plans to list cash-settled futures on the following equity securities:

Issuer
APPLE INC
ABBVIE INC
ADOBE INC
ADVANCED MICRO DEVICES
AMGEN INC
AMAZON.COM INC
BROADCOM INC
BOEING CO/THE
BANK OF AMERICA CORP
BOOKING HOLDINGS INC
BERKSHIRE HATHAWAY INC-CL B
CATERPILLAR INC
COMCAST CORP-CLASS A
CONOCOPHILLIPS
COSTCO WHOLESALE CORP
SALESFORCE INC
CISCO SYSTEMS INC
CHEVRON CORP
WALT DISNEY CO/THE
ALPHABET INC-CL C
HOME DEPOT INC
HONEYWELL INTERNATIONAL INC
INTL BUSINESS MACHINES CORP
INTEL CORP
JOHNSON & JOHNSON
JPMORGAN CHASE & CO
COCA-COLA CO/THE

ELI LILLY & CO
LOCKHEED MARTIN CORP
MASTERCARD INC - A
MCDONALD'S CORP
META PLATFORMS INC-CLASS A
MERCK & CO. INC.
MICROSOFT CORP
MICRON TECHNOLOGY INC
NEWMONT CORP
NETFLIX INC
NVIDIA CORP
ORACLE CORP
PALO ALTO NETWORKS INC
PEPSICO INC
PFIZER INC
PROCTER & GAMBLE CO/THE
PROLOGIS INC
QUALCOMM INC
STARBUCKS CORP
TESLA INC
TEXAS INSTRUMENTS INC
UNITEDHEALTH GROUP INC
VISA INC-CLASS A SHARES
VERIZON COMMUNICATIONS INC
WALMART INC
EXXON MOBIL CORP
3M CO