

Exhibit A

Explanation of Amendments to SwapEx Rulebook

Capitalized terms used but not defined herein have the meanings assigned to them in the Rulebook.

Amendment	Explanation
<u>Table of Contents</u> Conformed page references	Clarification
<u>Rule 101</u> 1. Amended the definition of “Required Swap Creation Data” to clarify that the term includes any data required to be reported under CFTC Regulation 45 and Appendix 1 thereto. 2. Amended the definition of “Swap Transaction and Pricing Data” to clarify that the term includes any data required to be reported under CFTC Regulation 43 and Appendix A thereto.	1. CFTC Regulation 45; CFTC Staff Request 2. CFTC Regulation 43; CFTC Staff Request
<u>Rule 207</u> 1. Amended to clarify that the Company will keep all books and records required to be maintained by the Commodity Exchange Act and CFTC Regulations readily accessible via real time electronic access throughout the life of the swap and for two years following the final termination of the swap, and retrievable by the Company within three business days through the remainder of the period following final termination of the swap during which it is required to be kept. 2. Amended to clarify that all of the foregoing records will be open to inspection upon request by the CFTC, the United States Department of Justice, the Securities Exchange Commission and any prudential regulator authorized by the CFTC.	1. CFTC Regulations 45.2(e)(1) 2. Clarification; CFTC Regulation 45.2(h)
<u>Rule 518</u> Amended to add new subsection (f) to require each Participant, Authorized Trader and Authorized User to provide post-trade allocation information to the Company for Contracts executed on the Trading System or pursuant to the Rules at the Company’s Request, and to require the Company to request, obtain and review post-trade allocation information as part of its trade practice and market	Clarification; CFTC No-Action Letter 15-68 (issued December 22, 2015); CFTC Staff Request

Amendment	Explanation
surveillance investigations into any trading activity involving post trade allocations.	
<u>Rule 526(g)</u> Formatted the table so that the head rows repeat at the top of each page.	Clarification
<u>Rule 528</u> Amended to clarify that the obligation of the Company to transmit swap transaction and pricing data to a registered Swap Data Repository applies to the Contracts executed on the Company’s Trading System as well as those executed pursuant to the Rules.	CFTC Regulations 43.3 and 45.3
<u>Rule 1101</u> Amended to clarify that the Company’s “Trading Hours” extends from 5:00 p.m. ET on Sunday to 5:00 p.m. ET on Friday, and that at 5:00 p.m. ET each day, the Company rolls the trade date to the next Business Day.	Clarification
<u>Rule 1102</u> Amended to clarify that the Company’s “Trading Hours” extends from 5:00 p.m. ET on Sunday to 5:00 p.m. ET on Friday, and that at 5:00 p.m. ET each day, the Company rolls the trade date to the next Business Day.	Clarification
<u>Rule 1103</u> Amended to clarify that the Company’s “Trading Hours” extends from 5:00 p.m. ET on Sunday to 5:00 p.m. ET on Friday, and that at 5:00 p.m. ET each day, the Company rolls the trade date to the next Business Day.	Clarification
<u>Rule 1104</u> Amended to clarify that the Company’s “Trading Hours” extends from 5:00 p.m. ET on Sunday to 5:00 p.m. ET on Friday, and that at 5:00 p.m. ET each day, the Company rolls the trade date to the next Business Day.	Clarification