

2 May 2018

Mr. Chris Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st St., N.W.
Washington, DC 20581
United States of America

VIA EMAIL

Dear Mr. Kirkpatrick,

Self-certification of Amendments to SGX-DC Clearing Rules

1 Introduction

1.1 Singapore Exchange Derivatives Clearing Limited ("SGX-DC"), a derivatives clearing organisation ("DCO") registered with the Commodity Futures Trading Commission (the "Commission"), hereby submits a self-certification for amendments to its Clearing Rules (the "Amendments") pursuant to Commission regulation 40.6(a).

2 Intended Implementation Date

2.1 The Amendments are proposed to be implemented on 21 May 2018, but will not be implemented prior to the Commission's 10 business day review period.

3 Explanation and Analysis

3.1 The Amendments are to facilitate SGX-DC's acceptance for clearing of the Panamax Route P2E Forward Freight Agreement and Capesize Route C7 Forward Freight Agreement (the "Contracts") that is to be launched in April 2018. In particular, the Amendments specify the methodology for the calculation of final settlement prices of the Contract in the SGX-DC Clearing Rules.

4 Description of Amendments

- 4.1 Appendix 1 of the SGX-DC Clearing Rules and the Clearing Fees schedule will be amended as a result of the Amendments.
- The text of the Amendments with the changes indicated is attached as <u>Appendix A</u>. The Clearing Fees are set out in <u>Appendix B</u>.

Singapore Exchange Derivatives Clearing Limited

Company Reg No. 200005878M (A wholly-owned subsidiary of Singapore Exchange Limited)

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5 Certification of Compliance with Core Principles

- 5.1 The Amendments have been promulgated in respect of SGX-DC's compliance with Core Principle E on settlement procedures and seek to provide clarity on the final settlement prices for the Contract.
- 5.2 SGX-DC hereby certifies to the Commission that the Amendments comply with the Commodity Exchange Act, as amended, and the regulations promulgated thereunder.

6 Public Notice of Pending Certification

6.1 SGX-DC has made publicly available a notice of the Amendments' pending certification with the Commission, together with a copy of this submission on its website at the following address: http://www.sgx.com/wps/portal/sgxweb/home/regulation/consult_pub/dco_submissions.

7 Opposing Views

7.1 There were no opposing views expressed to SGX-DC by its board or committee members, SGX-DC Clearing Members or market participants that were not incorporated into the Amendments. If any opposing views are received by SGX-DC during the Commission's review period, such views will be communicated to the Commission accordingly.

8 Contact Details

8.1 Please do not hesitate to contact the undersigned at candace.li@sgx.com or +65 6713 6319 should you require any clarification.

Yours sincerely,

Candace Li Associate

Regulatory Development and Policy (Regulation)

Appendix A Proposed Rule Amendments to SGX-DC Clearing Rules

Note: Changes are made in blue.

Appendix 1 – Final Settlement Price

Freight Forward Contracts: Dry Trip Timecharter Routes

Entitled	PH 1	
Contract	Panamax Route P2E Forward Freight Agreement Skaw/Gibraltar — Far East. Entire	
	Month Average	
<u>Final</u>	Arithmetic average of all Baltic's daily spot assessments in the Contract Month for	
<u>Settlement</u>	ement the relevant underlying product, rounded to 4 decimal places	
<u>Price</u>		

Freight Forward Contracts: Dry Voyage Routes

Product	C3	C4	GI.		
Contract	Capesize Route C3	Capesize Route C4 Forward	Capesize Route C7		
	Forward Freight	Freight Agreement Richards	Forward Freight		
	Agreement	Bay-Rotterdam. 150,000mt	Agreement Bolivar-		
	Tubarao/Beilun and		Rotterdam. 150,000mt		
	Baoshan. 150,000mt				
Final	Arithmetic average of last 7 Baltic's daily spot assessments in the Contract Month for				
Settlement	the relevant underlying product, rounded to 4 decimal places				
Price					

Product	C5	(7)	
Contract	Capesize Route C5 Forward Freight	Capesize Route C7 Forward Freight	
	Agreement W Australia — Qingdao.	Agreement Bolivar-Rotterdam.	
	160,000mt	150,000mt	
Final	Arithmetic average of all Baltic's daily spot assessments in the Contract Month for		
Settlement	the relevant underlying product, rounded to 4 decimal places		
Price			

Appendix B Clearing Fees

Clearing Fee Type		Panamax	Capesize
		Route P2E FFA	Route C7 FFA
Cf 1	Trading Member (Individual)	US \$ 4.50	US \$ 4.50
Cf 2	Clearing Member House Account	US \$ 4.50	US \$ 4.50
Cf 3	Trading Member (Broker) House Account	US \$ 4.50	US \$ 4.50
Cf 5	Clearing Member Customer Account	US \$ 4.50	US \$ 4.50
Cf 6	Trading Member (Broker) Customer Account	US \$ 4.50	US \$ 4.50
Cf 7	Trading Member (Proprietary) (Customer)	US \$ 4.50	US \$ 4.50
Cf 8	Clearing Member Related Company House Account	US \$ 4.50	US \$ 4.50
Cf E	Trading Member's Trading Representatives (House)	US \$ 4.50	US \$ 4.50
Cf F	Trading Member's Trading Representatives (Customer)	US \$ 4.50	US \$ 4.50
Cf G	Clearing Member's Trading Representatives (House)	US \$ 4.50	US \$ 4.50
Cf K	Trading Member (Proprietary) (House)	US \$ 4.50	US \$ 4.50

^{*}Prices shown are before GST.