

August 27, 2026

Submitted via Portal

Mr. Christopher J. Kirkpatrick  
Office of the Secretariat  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20581

**Re: CFTC Regulation 40.6(a) Rule Certification - AEGIS Markets  
Amendments to Rulebook and N-5 Shared Services Agreement**

Dear Sir:

Pursuant to Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the "CFTC", or the "Commission"), AEGIS Markets ("AEGIS") hereby notifies the Commission that it has amended its (Ex. M) AEGIS-SEF Rulebook and (Ex. N-5) AEGIS-SEF Shared Services Agreement. The Rule Amendments shall become effective 10 days after this submission has been filed or immediately upon approval by the CFTC, whichever occurs first.

A concise explanation and analysis of the rules and their compliance with applicable provisions of the Act, including core principles and the Commission's regulations, is attached hereto as Exhibit A. A copy of the Rulebook is attached under separate cover as Exhibit B. A redlined version of the Rulebook is attached under separate cover as Exhibit C. A copy of the Shared Services Agreement is attached under separate cover as Exhibit D. A redlined version of the Shared Services Agreement is attached under separate cover as Exhibit E.

AEGIS hereby certifies that: (i) the amendments comply with the Act and the Commission's regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on AEGIS's website. There were no substantive opposing views to the amendments.

Please contact the undersigned at 832-431-4217 or [mvalenzuela@aegis-markets.com](mailto:mvalenzuela@aegis-markets.com) with any questions regarding this matter.

A handwritten signature in black ink, appearing to read "Melody Valenzuela".

Melody Valenzuela  
Chief Compliance Officer  
AEGIS Markets  
2829 Technology Forest Blvd  
Suite 440  
The Woodlands, TX 77381

## Exhibit A – Explanation

| Amendment and Explanation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Supporting Rule / Core Principle                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Rules 1.2, 1.5, 1.6, 1.7, 1.8, 1.10, 1.42, 1.82, 1.84, 1.98, 1.118</b> <ul style="list-style-type: none"> <li>• Updates to definitions to clean up out of date language</li> <li>• Adding newly defined terms</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |
| <b>Rules 2.1.8, 2.6.1, 2.6.2, 2.6.3, 2.8.1, 2.10.1, 2.11.1, 3.1.1, 3.3.3, 3.5.1, 3.7.2, 3.9.1, 3.12.4, 3.13.1, 3.15.2, 3.15.5, 4.1.2, 4.1.3, 4.3.6, 4.7, 4.7.10, 4.7.11, 4.7.13, 4.8.6, 4.17.1, 4.18.1, 4.18.2, 4.18.6, 6.14.1, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.8, 7.9, 7.10, 7.11, 7.12, 7.13, 7.14, 7.16, 7.17, 7.18, 7.19, 9.1.5, 9.1.6, 9.4, 9.7.3 &amp; Exhibit A – Regulatory Oversight Committee Charter</b> <ul style="list-style-type: none"> <li>• Non-substantive amendments to clean-up formatting and grammar</li> <li>• Non-substantive amendments to clean-up use of affiliate references to track with defined terms.</li> <li>• Non-substantive amendments to clean-up references to rule numbers throughout rulebook</li> <li>• Removal of single instance of “NPCEU”, non-defined term, not applicable as it refers to CEUs which do not participate on the Platform</li> </ul> | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |

|                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Rule 2.5 Confidentiality</b> <ul style="list-style-type: none"> <li>• Clean up of rule structure to consolidate redundancies</li> <li>• Expanded scope of the rule to address any AEGIS SEF Affiliate where COI might present.</li> </ul>                                  | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |
| <b>Rule 2.6.5</b> <ul style="list-style-type: none"> <li>• Added identification of Rule 2.6.7 and Rule 2.6.8 as related to “Rules to Detect and Minimize Conflicts of Interest in Decision-Making Process”</li> </ul>                                                         | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |
| <b>Rule 2.6.7</b> <ul style="list-style-type: none"> <li>• <b>NEW</b> rule addressing Information Controls Applicable to AEGIS-SEF Affiliates</li> <li>• Assists with adherence to information and data restrictions and prohibitions between AEGIS-SEF Affiliates</li> </ul> | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |

|                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Rule 2.6.8</b></p> <ul style="list-style-type: none"> <li>• <b>NEW</b> rule addressing Procedures for Review and Resolution of AEGIS-SEF Affiliate-Related Conflicts</li> <li>• Assists with adherence to mitigation of conflicts of interest between AEGIS-SEF Affiliates</li> </ul>                                                                  | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |
| <p><b>Rule 3.2.1</b></p> <ul style="list-style-type: none"> <li>• Added language to adhere to impartial treatment and explicitly state AEGIS-SEF Affiliates shall not receive preferential treatment.</li> </ul>                                                                                                                                             | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |
| <p><b>(Ex. N5) AEGIS SEF Shared Services Agreement</b></p> <ul style="list-style-type: none"> <li>• Added language to support adherence to conflicts of interest rules and mitigation of conflicts of interest between AEGIS-SEF Affiliates</li> <li>• Non-substantive updates to clean up out of date references to staff and business functions</li> </ul> | <ul style="list-style-type: none"> <li>• Core Principle 1 – Compliance with Core Principles</li> <li>• Core Principle 2 – Compliance with Rules</li> <li>• Core Principle 4 – Monitoring of Trading and Trade Processing</li> <li>• Core Principle 12 – Conflicts of Interest</li> <li>• Core Principle 14 - Systems Safeguards</li> <li>• Core Principle 15 – Designation of Chief Compliance Officer</li> </ul> |

**Exhibit B – Ex. M AEGIS Markets Rulebook - clean**

(attached under separate cover)

**Exhibit C – Ex. M AEGIS Markets Rulebook - redline**

(attached under separate cover)

**Exhibit D – Ex. N-5 AEGIS SEF Shared Services Agreement - clean**

(attached under separate cover)

**Exhibit E – Ex. N-5 AEGIS SEF Shared Services Agreement - redline**

(attached under separate cover)