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Via CFTC Portal Submissions

Mr. Christopher Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington D.C. 20581

**RE: Self-Certification of Rule Amendments: Nadex Adds China 50 Contracts –
Submission Pursuant to Commission Regulation §40.2(a)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and section §40.2(a) of the regulations promulgated by the Commodity Futures Trading Commission (the “Commission”) under the Act (the “Regulations”), North American Derivatives Exchange, Inc. (“Nadex”, the “Exchange”) hereby submits to the Commission its amendments to the Nadex Rulebook which add new Binary Contracts to its current product listing. Nadex hereby submits the terms and conditions of the new China 50 Binary Contracts (the “China 50 Contracts” or the “Contracts”) as represented in the following new Rule:

- **RULE 12.57 CHINA 50 BINARY CONTRACTS**

Nadex plans to list cash-settled Daily and Weekly Binary Option Contracts based on the SGX^{®1} FTSE^{®2} Xinhua^{®3} China A50 Index Futures (the “CHFC”) to its market participants.

The China A50 Index Futures contract is traded on the Singapore Exchange (“SGX”) and is based on the FTSE China A50 Index, which tracks the performance of 50 companies traded on the Shanghai and Shenzhen Stock Exchanges. The CHFC was launched on the Singapore Exchange in 2006 and its popularity and demand has shown rapid growth over the past few years. The CHFC market is deep and liquid, and widely traded cash markets currently exist for the securities that comprise the China A50 Index.

While Nadex has entered into a licensing agreement with SGX with respect to Nadex’s offering of the China 50 Contracts, Nadex has no ownership or other interest in either the cash markets for the securities that comprise the cash indices or the SGX FTSE Xinhua China A50 Index Futures. In addition, Nadex is not affiliated with SGX, and none of SGX’s affiliates sponsor or endorse Nadex or its products in any way. Nadex and SGX both are signatories to the International Information Memorandum of Understanding and Agreement.

The China 50 Contracts will initially be offered with one-day and one-week durations. The China 50 Contracts will rollover monthly to the next futures trading month, based on the rollover schedule in the underlying CHFC market. The last trading day for a given underlying futures month in a China 50 Contract will be three business days prior to the last trading day of that futures month in the underlying CHFC market. For example, if the last trading day in the SGX FTSE Xinhua China A50 Index Futures market is the second to last business day of the contract month, then the last trading day for the March 2015 contract in the underlying CHFC market would be March 30, 2015. Accordingly, the last day to trade the China 50 Contract based on the underlying March 2015 futures contract would be March 25, 2015. Weekly contracts listed on a Monday during a week containing an underlying futures rollover date will be listed using the underlying futures month scheduled to be used to determine the expiration value on the

¹ SGX[®] is a registered service mark of the Singapore Exchange Limited (“SGX”). All rights in the Trademarks and Futures Trading Data of SGX vest in Singapore Exchange Limited (“SGX”). The Nadex China 50 Binary Contract is not sponsored, endorsed, sold or promoted by SGX. SGX makes no representation or warranty, express or implied to the investors in the China 50 Binary Contract or any member of the public in any manner whatsoever regarding the advisability of investing in any financial product generally or in particularly the China 50 Binary Contract. The relationship of SGX towards Nadex is in respect of licensing the use of the SGX FTSE Xinhua China A50 Index Futures Trading Data. SGX has no obligation to take the needs of the investors of the China 50 Binary Contract into consideration in determining, composing or calculating the SGX FTSE Xinhua China A50 Index Futures Trading Data. SGX is neither responsible for nor has participated in the structure of the China 50 Binary Contract. SGX has no obligation or liability in connection with the administration, marketing or trading of the China 50 Binary Contract.

² FTSE[®] is a trade mark jointly owned by the London Stock Exchange plc and the Financial Times Limited.

³ Xinhua[®] is a registered mark of Xinhua Financial Limited.

day the contract expires. For example, the last trading date for the SGX FTSE Xinhua China A50 Index Futures March 2015 contract is March 30, 2015. The last trading date for the March 2015 China 50 Contract would be March 25, 2015, and the underlying futures month would roll to April 2015 for trade date March 26, 2015. Because March 26, 2015 is a Thursday, however, and any Nadex weekly contracts listed on this date and expiring on Friday, March 27, 2015, will be listed using the SGX FTSE Xinhua China A50 Index April 2015 Futures as its Underlying, as May is the futures month scheduled to be used to determine the expiration value of the Nadex weekly contract on its expiration date. Therefore, the first trading date for the Start Date for the SGX FTSE Xinhua China A50 Index Futures April 2015 futures contract will be Monday, March 23, 2015 for any Nadex weekly contracts listed on this date. Specific rollover dates are set forth in the Rollover Schedule attached in Exhibit C, and will be made available on the Nadex website.

Nadex has at least one dedicated market maker who will be contractually obligated to price a two sided market up to two minutes prior to expiration in these contracts. Nadex, as the Source Agency, will calculate the Expiration Value of each Nadex China 50 Contract listed, using the same method the Exchange currently uses to determine the Expiration Value for its other Index based products. Nadex will collect the last 25 trade prices from the underlying CHFC market, remove the highest and lowest five prices, and average the remaining 15 prices to one decimal point past the precision of the underlying to arrive at the Contract's Expiration Value. Nadex plans to obtain the underlying data for the CHFC from Reuters, however, if data for the CHFC is unavailable from Reuters, or in the discretion of the Exchange one or more of the available prints is not appropriate for settlement, Nadex may obtain underlying data for settlement purposes from another data source Nadex deems appropriate under the circumstances. Expiration Values for the Nadex China 50 Contracts will be published on the Nadex website for each listed Contract as soon as practicable after the expiration of that Contract.

The calculation methodology for the Expiration Values mitigates the possibility of manipulation or any party trading with advance knowledge of the Expiration Value prior to expiration of the Contract. The underlying CHFC is traded in real-time; it is not possible for an "early" release of the CHFC trade prices or the relevant Expiration Value for the Contract to occur, as trading in the China 50 Contracts ceases concurrently with the fixing of the relevant prices that will be used in calculating the Expiration Value. Additionally, as with all of Nadex's contracts, the China 50 Contracts will be fully collateralized.

This submission also provides notice that Nadex is also amending Rule 4.4 (Obligations of Market Makers) which specifies certain binary contracts' position limits from which approved market makers engaged in bona fide market making activities are exempt. Approved market makers will be exempt from the China 50 Contract's position limit of 2,500 contracts and will

instead be subject to a limit of twice the specified amount. Additionally, the limit does not apply to the entire class of Binary Contracts, but rather to each Contract in the class (i.e. per strike). The 2,500 position limit would still remain for all other non-market maker participants; however, confining market makers to these limits would require the market makers to stop quoting bids and offers in all China 50 Contracts when they reach the threshold. In addition to those participants trying to trade China 50 Contracts, such requirement would be especially detrimental to participants attempting to liquidate open positions. Moreover, under the 2,500 limit a single trader could place orders to establish a total position of 2,500 contracts long or short in a Weekly China 50 Contract(s) early in a week and, if the trades occur opposite the market maker, the market maker would be prevented from making any markets in any other Daily or Weekly China 50 Contract for the remainder of the week, which defeats the purpose of having a dedicated market maker.⁴

DCM CORE PRINCIPLES: CHINA 50 BINARY CONTRACTS

Nadex has identified the following Designated Contract Market (“DCM”) Core Principles as potentially being impacted by the addition of the China 50 Contracts: Core Principle 2 Compliance with Rules; Core Principle 3 Contracts Not Readily Subject to Manipulation; Core Principle 4 Prevention of Market Disruption; Core Principle 7 Availability of General Information; Core Principle 8 Daily Publication of Trading Information.

Core Principle 2, implemented by Commission Regulations 38.156 and 38.157, requires the DCM to maintain an automated trade surveillance system capable of detecting and investigating potential trade practice violations, and to conduct real-time market monitoring of all trading activity. Nadex uses the automated SMARTS[®] surveillance system to aid in the ongoing monitoring of all trading activity, and has the capability of detecting potential trade practice violations based on the parameters set by the DCM. This surveillance system monitors activity real-time and as with all Nadex contracts, day or night, the system will monitor the new Daily and Weekly China 50 Binary Contracts. Therefore, the listing of the China 50 Contracts will not negatively impact Nadex’s ability to comply with this Core Principle.

Core Principles 3 and 4, implemented by Commission Regulations 38.200 and 38.251, require the DCM to list only contracts that are not readily susceptible to manipulation and to prevent market disruption. Nadex has a designated market maker who is obligated to provide liquidity in the China 50 Contracts, limiting opportunities for the market to be manipulated.

⁴ Once the market maker reaches the position limit, it can enter only orders to close out those existing positions until it has successfully reduced the position enough to alleviate the position limit issue.

Nadex also uses the SMARTS surveillance system to assist with market monitoring and has a staff dedicated to market surveillance. As with all Nadex Contracts, trades placed in the China 50 Contracts will be required to be fully collateralized. Nadex has also described its Expiration Value calculation process which involves removing the highest and lowest five outlier prices and averaging the remaining prices, which mitigates the potential for manipulation of the Expiration Value through attempts to move the underlying Index Futures upon which the China 50 is based. The Core Principle further requires a DCM that uses an index traded at another venue have agreements that allow it to access market information on the activities of the traders in the reference market. In addition to the SMARTS system which detects deviations in pricing, Nadex has a dedicated 24 hour staff that monitors the markets in real-time. Nadex and SGX are both members of the Intermarket Surveillance Group and have entered information sharing Memorandums of Understanding and Agreement. Therefore, Nadex's ability to comply with these Core Principles will not be negatively impacted.

Core Principles 7 and 8, implemented by Commission Regulation 38.401 and 38.451, require the DCM to make available to the public accurate information regarding the contract terms and conditions, as well as daily information on contracts such as settlement price, volume, open interest, and opening and closing ranges. Nadex makes available on its website the Exchange Rulebook, as well as the Daily Bulletin which contains the preceding information. The Results page on the website also publishes the Expiration Value and Settlement Value for all Nadex contracts settled during that week. Contract specifications for the China 50 Contracts will be set forth in the Rulebook and linked on the Nadex website. Daily settlement prices, volume, open interest, and opening and closing ranges for the new contracts will be included on the Daily Bulletin and posted on the Nadex website. Therefore, the listing of the China 50 Contracts will not negatively impact Nadex's ability to comply with these Core Principles.

DCO CORE PRINCIPLES: CHINA 50 BINARY CONTRACTS

Nadex has identified the following Derivatives Clearing Organization ("DCO") Core Principles as potentially being impacted by the addition of the China 50 Contracts: Core Principle C Participant and Product Eligibility; Core Principle L Public Information.

Core Principle C, implemented by Commission Regulation 39.12, requires the DCO to establish appropriate requirements for determining the eligibility of transactions submitted to it for clearing. Nadex has found that transactions in the China 50 Contracts are eligible for clearing and not readily susceptible to manipulation. The Contracts will be based on the

underlying SGX FTSE Xinhua China A50 Index Futures, which is an actively traded market based on the China A50 Index which tracks 50 of the largest companies traded on the Shanghai and Shenzhen Stock Exchanges. Nadex has a designated market maker who is obligated to price a two-sided market for these Contracts, thereby providing sufficient liquidity. Additionally, Nadex is operationally able to accept the transactions for clearing and address any unusual characteristics of a transaction. Finally, all trading in the China 50 Contracts, as all Nadex products, will be conducted on a fully-collateralized basis, thereby mitigating any credit risk of a particular member to Nadex or other market participant. Nadex has therefore determined that these contracts are appropriate to accept for clearing.

Core Principle L, implemented by Commission Regulation 39.21, requires the DCO to make available to the public the terms and conditions of each contract, as well as the daily settlement prices, volume, and open interest of the contract. The Nadex Rulebook is made available to the public on the Nadex website. All terms and conditions of the China 50 Contracts will be set forth in the contract specifications portion of the Rulebook, and will continue to be made available on the Nadex website. Settlement values for the China 50 Contracts will be listed on the Nadex website on the 'Results Page', as well as the Daily Bulletin which also shows volume and open interest. Therefore, the addition of the China 50 Contracts will not negatively impact Nadex's ability to comply with this Core Principle.

DCM CORE PRINCIPLES: AMENDMENT OF MARKET MAKER OBLIGATIONS

Nadex has identified the following DCM Core Principles as potentially being impacted by the addition of the China 50 Contracts: Core Principle 3 Contracts Not Readily Subject to Manipulation; Core Principle 4 Prevention of Market Disruption; Core Principle 5 Position Limitations or Accountability; Core Principle 7 Availability of General Information.

Core Principle 3, implemented by Commission Regulation 38.200, requires the DCM to only list contracts that are not readily susceptible to manipulation and Core Principle 4, implemented by Commission Regulation 38.251, requires the DCM to have the capacity and responsibility to prevent manipulation, price distortion, and disruptions. While position limits are in place to deter market manipulation, exempting market makers engaged in bona fide market making activities from these limits is not likely to increase the risk of manipulation in these Contracts by a market maker. Nadex has a range of protections in place to deter and, if necessary, detect and address any efforts to manipulate the price of an underlying contract. These include the SMARTS surveillance systems, 24-hour staff, as well as its participation in the Joint Audit Committee, Intermarket Surveillance Group, and the International Information

Sharing Memorandum of Understanding and Agreement. Moreover, Rule 4.4 requires the market maker taking advantage of the Alternative Position Limit to provide Nadex with a trade register of all futures trading activity in any account owned or controlled by the market maker in the SGX FTSE Xinhua China A50 Index Futures underlying during the 15 minutes immediately before and after the Contract's expiration time. Furthermore, the 2,500 position limit will remain in effect for all non-market maker participants. Therefore, the amendment of Rule 4.4 will not negatively impact Nadex's ability to comply with these Core Principles.

Core Principle 5, implemented by Commission Regulation 38.301, requires the DCM to "adopt for each contract of the board of trade, as is necessary and appropriate, position limitations or position accountability for speculators." Nadex has adopted a position limit of 2,500 in its China 50 Contracts which will be applicable to all non-market maker participants. Nadex believes that exempting its market makers from this modest position limit is appropriate and necessary in order to maintain sufficient liquidity in the China 50 market. Market makers taking advantage of the exemption would be subject to an Alternative Position Limit of twice the limit specified in Rule 4.4 (i.e. 5,000) in each China 50 Contract, as opposed to the entire China 50 Class of contracts. The same Alternative Position Limit has been in place for the Nadex US Indices Binary Contracts since March 2011. Since that time there have been no instances of market manipulation, or attempted manipulation, by any Nadex market maker. Nadex has no reason to believe that permitting a market maker to utilize the Alternative Position Limit would prove any different than it has in those markets for which the exemption is already allowed. Nadex has therefore determined that the amendment of Rule 4.4 to permit an Alternative Position Limit for approved market makers engaged in bona fide market making activities will not negatively impact Nadex's ability to comply with this Core Principle.

Core Principle 7, implemented by Commission Regulation 38.401, requires the DCM to make available to the public accurate information regarding the contract terms and conditions. The China 50 Contract's position limits are specified in Rule 12.57 in the Nadex Rulebook, and Alternative Position Limits are set forth in Rule 4.4. Nadex makes its Rulebook available to the public on its website. Position limits are also available to the public on the Nadex website directly beneath the contract specifications for any particular contract on that contract's corresponding webpage. Therefore, the amendment of Rule 4.4 pertaining to position limits will not negatively impact Nadex's ability to comply with this Core Principle.

**DCO CORE PRINCIPLES: AMENDMENT OF MARKET MAKER
OBLIGATIONS**

Nadex has not identified any DCO Core Principles which would be impacted by the amendments to Rule 4.4 Market Maker Obligations.

In accordance with §40.2(a)(2) of the Commission's Regulations, Nadex plans to implement these Rule changes for the start of business on trade date March 16, 2015.

These Rule changes have been outlined in Exhibit A. The amendments to the Rulebook are set forth in Exhibit B. Any deletions are stricken out while the amendments and/or additions are underlined. The Rollover Schedule for upcoming China 50 Rollover dates are attached in Exhibit C.

Nadex hereby certifies that the additions contained herein comply with the Act, as amended, and the Commission Regulations adopted thereunder. No substantive opposing views were expressed to Nadex with respect to any of these actions.

Nadex hereby certifies that a copy of these additions was posted on its website at the time of this filing.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 884-0953 or by email at Donald.horwitz@nadex.com.

Sincerely,



Donald L. Horwitz
General Counsel and Chief Regulatory
Officer

EXHIBIT A

Rule	Asset	Duration/Close Time	Action	Effective Date
4.4	Obligations of Market Makers	N/A	Exempt market makers from China 50 Binary Contract position limit stated in 12.57.	3/16/2015
12.57	China 50 Binary Contracts	Weekly: 2:55AM ET (3:55AM ET DST) Daily: 2:55AM ET(3:55AM ET DST)	Add contract specifications for new China 50 Binary Contracts	3/16/2015

EXHIBIT C

Addition of Rule 12.57, Amendment of Rule 4.4

(The following Rule amendments are underlined and deletions are stricken out)

RULES 1.1 – 4.3 [UNCHANGED]

RULE 4.4 OBLIGATIONS OF MARKET MAKERS

(a) General – Transactions of Market Makers should constitute a course of dealings reasonably calculated to contribute to the maintenance of a fair and orderly market, and Market Makers shall not make bids or offers or enter into transactions that are inconsistent with such a course of dealings. Ordinarily, Market Makers shall be obligated to do the following:

- (i) trade for the proprietary account of the Market Maker only;
- (ii) maintain at least the minimum capital on deposit with Nadex in accordance with the terms of the applicable Market Maker Agreement;
- (iii) comply with all other terms of the applicable Market Maker Agreement; and
- (iv) maintain two-sided displayed quotes of a minimum designated quantity (“Size”) within a predefined spread (“Bid/Ask Spread”) for a Series of Contracts for a certain period of time throughout the trading day in accordance with the terms of the applicable Market Maker Agreement.

(1) In ordinary market conditions, quotes must be made within a maximum Bid/Ask Spread.

(2) In fast market conditions, Market Makers will be permitted to refrain from quoting binding bid and offer prices, in accordance with the Market Maker Agreement.

(3) Market Makers will be permitted to reduce their size:

(A) in any Binary Contract within a Designated Class that is so deep in-the-money as to be valued at \$100 offer or so deep out-of-the-money as to be valued at zero bid and

(B) in any Variable Payout Contract within a Designated Class when the underlying for that Variable Payout

Contract is outside the range of the Variable Payout Contract.

(b) A Market Maker has a continuous obligation to engage, to a reasonable degree under the existing circumstances, in dealings for the account of the Market Maker when there exists, or it is reasonably anticipated that there will exist, a lack of price continuity or a temporary disparity between the supply of and demand for quotations in a Series of a Designated Class to which the Market Maker is appointed. Without limiting the foregoing, a Market Maker is expected to perform the following activities in the course of maintaining a fair and orderly market;

(i) To post bid and ask quotations in all Designated Classes to which the Market Maker is appointed that, absent changed market conditions, will be honored by the Market Maker.

(ii) To update quotations in response to changed market conditions in all Designated Classes to which the Market Maker is appointed.

(iii) All such Market Maker quotations shall be submitted as "Post-Only orders". In the event a Market Maker has built a position size equal to or greater than 90% of any applicable position limit in a particular Class or Contract, then that Market Maker may submit non-Post-Only orders (that is, traditional limit orders) in lieu of its quoting obligation for such Class or Contract until the Market Maker's position in such Class or Contract has been reduced to 75% of the applicable position limit, at which point the Market Maker's obligation to submit Post-Only orders will resume.

(iv) A Market Maker may submit non-Post-Only orders in markets to which the Market Maker has not been appointed and, provided the Market Maker continues to meet its obligations to continuously quote a two-sided market under the Market Maker Agreement and these Rules, in Designated Classes to which the Market Maker is appointed .

(c) Like other Members of Nadex, a Market Maker may not place an order to buy or sell a Contract in a Class unless it has the excess funds in its Nadex account necessary to fulfill its obligations under that order.

(d) Alternative Position Limits for Certain Binary Contracts

(i) Approved market makers who are engaged in bona fide market-making activity shall be exempt from the position limits for those Binary Contracts defined in

(1) Rules 12.20 (Bitcoin), 12.55 (Japan 225), 12.57 (China 50), 12.65 (Wall Street 30), 12.63 (US Tech 100), 12.59 (US 500) and 12.61 (US SmallCap 2000) of these Rules. Instead, such market makers shall be subject to Alternative Position Limits of twice the limit identified for such Binary Contract in Chapter 12. In addition, such Alternative Position Limits shall apply not to the entire class of Binary Contracts, but to each Binary Contract in that Class (i.e., per strike).

(2) Rules 12.3 (Copper), 12.5 (Gold), 12.7 (Silver), 12.9 (Crude Oil), 12.11 (Natural Gas), 12.49 (FTSE 100) and 12.51 (Germany 30) of these Rules. Instead, such market makers shall be subject to Alternative Position Limits of the limit identified for such Binary Contract in Chapter 12, which limit shall apply not to the entire class of Binary Contracts, but to each Binary Contract in that Class (i.e., per strike).

- (ii) A market maker taking advantage of this exemption and an Alternative Position Limit must, within 1 business day following a request by Nadex's Compliance Department, provide the Nadex Compliance Department with a trade register detailing all trading activity in any account owned or controlled by the market maker in the contract underlying a Binary Contract during the 15 minutes immediately before and after any expiration time identified by Nadex's Compliance Department in the request.

RULES 5.1 – 12.56 [UNCHANGED]

RULE 12.57 CHINA 50 BINARY CONTRACTS

(a) SCOPE – These Rules shall apply to the Class of Contracts referred to as the China 50 Binary Contracts issued by Nadex.

(b) UNDERLYING – The Underlying for this Class of Contracts is the SGX[®] FTSE[®] Xinhua[®] China A50 Index Futures⁵ contracts (“CHFC”) traded on the Singapore Exchange (SGX). The CHFC prices that will be used to calculate the Underlying will be taken from twelve (12) CHFC futures months: January, February, March, April, May, June, July, August,

⁵ SGX[®] is a registered service mark of the Singapore Exchange Limited (“SGX”). All rights in the Trademarks and Futures Trading Data of SGX vest in Singapore Exchange Limited (“SGX”). The Nadex China 50 Binary Contract is not sponsored, endorsed, sold or promoted by SGX. SGX makes no representation or warranty, express or implied to the investors in the China 50 Binary Contract or any member of the public in any manner whatsoever regarding the advisability of investing in any financial product generally or in particularly the China 50 Binary Contract. The relationship of SGX towards Nadex is in respect of licensing the use of the SGX FTSE Xinhua China A50 Index Futures Trading Data. SGX has no obligation to take the needs of the investors of the China 50 Binary Contract into consideration in determining, composing or calculating the SGX FTSE Xinhua China A50 Index Futures Trading Data. SGX is neither responsible for nor has participated in the structure of the China 50 Binary Contract. SGX has no obligation or liability in connection with the administration, marketing or trading of the China 50 Binary Contract. FTSE[®] is a trade mark jointly owned by the London Stock Exchange plc and the Financial Times Limited. Xinhua[®] is a registered mark of Xinhua Financial Limited.

September, October, November, December (each a “CHFC Delivery Month”). The date on which a new delivery month will be used as the Underlying for Nadex contracts (i.e. “Start Date”) is one calendar day after the End Date for the previous delivery month contract. The last day on which a delivery month will be used as the Underlying for Nadex contracts (i.e. “End Date”) is the third business day prior to the last trading day of the Underlying futures contracts Expiration Date. For example, the SGX FTSE Xinhua China A50 Index March 2015 Futures has an Expiration Date of March 30, 2015. The last day on which the China A50 Index March 2015 Futures prices will be used as the Underlying for Nadex contracts and to calculate the Expiration Value on the Expiration Date for the relevant China 50 Contracts will be the third business day prior to the China A50 Index Futures’ Expiration Date (i.e. March 30, 2015). Therefore, the End Date for using the China A50 Index March 2015 Futures will be March 25, 2015, and the Start Date for the next delivery month, China A50 Index April 2015 Futures, will be March 26, 2015.⁶

(c) SOURCE AGENCY – The Source Agency is Nadex.

(d) TYPE – The Type of Contract is a Binary Contract.

(e) ISSUANCE – For each planned release by the Source Agency of the Underlying, Nadex will issue various Contracts, each of a different Series. A new issuance of Contracts will commence no later than two (2) business days following the Expiration Date.

(f) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by Nadex at the time the Binary Contracts are initially issued. For the China 50 Binary Contract, the Payout Criteria for the Contracts will be set as follows:

(i) WEEKLY CHINA 50 BINARY CONTRACTS

- (1) EXPIRATION TIME – 2:55AM ET CLOSE⁷
- (2) STRIKE INTERVAL WIDTH – The interval width between each strike level shall be 100.

⁶ Weekly contracts listed on a Monday during a week containing an underlying futures rollover date will be listed using the underlying futures month scheduled to be used to determine the settlement value on the day the contract expires. For example, the last trading date for the SGX FTSE Xinhua China A50 Index Futures March 2015 contract is March 30, 2015. The last trading date the Nadex China 50 Binary Contract would be based on the underlying April 2015 contract month would be March 25, 2015, and the underlying futures month would roll to April 2015 for trade date March 26, 2015. March 26, 2015 is a Thursday, however, and any Nadex weekly contracts listed on this date and expiring on Friday, March 27, 2015, will be listed using the SGX FTSE Xinhua China A50 Index April 2015 Futures as its Underlying, as May is the futures month scheduled to be used to determine the Settlement Value of the Nadex weekly contract on its expiration date. Therefore, the first trading date for the Start Date for the SGX FTSE Xinhua China A50 Index Futures April 2015 futures contract will be Monday, March 23, 2015 for any Nadex weekly contracts listed on this date.

⁷ During the period when the US observes daylight savings time, Weekly China 50 Binary Contracts will open and close 1 hour later than their regular defined times.

- (3) NUMBER OF STRIKE LEVELS LISTED - Thirteen (13) strike levels will be listed for the Weekly China 50 Binary Contract Series.
- (4) STRIKE LEVELS GENERATED - Strike levels will be generated such that Binary Contract "W" is valued 'at-the-money' in relation to the Underlying market as determined by the Source Agency, immediately before the issuance of these Contracts, and shall be measured in U.S. cents rounded to the nearest value ending in 25 or 75 as reported by the Source Agency. Six (6) strike levels will be generated above Binary Contract W at an interval of one-hundred (100), and six (6) strike levels will be generated below Binary Contract W at an interval of 100 (e.g. $W - 100$; W ; $W + 100$). The Contract will have a Payout Criterion of greater than the strike level value.

(ii) DAILY CHINA 50 BINARY CONTRACTS

- (1) EXPIRATION TIME – 2:55AM ET CLOSE⁸
- (2) STRIKE INTERVAL WIDTH – The interval width between each strike level shall be 20.
- (3) NUMBER OF STRIKE LEVELS LISTED - Fifteen (15) strike levels will be listed for the Daily China 50 Binary Contract Series.
- (4) STRIKE LEVELS GENERATED - Strike levels will be generated such that Binary Contract "X" is valued 'at-the-money' in relation to the Underlying market as determined by the Source Agency, immediately before the issuance of these Contracts, and shall be measured in U.S. cents rounded to the nearest value ending in 10 as reported by the Source Agency. Seven (7) strike levels will be generated above Binary Contract X at an interval of 20, and seven (7) strike levels will be generated below Binary Contract X at an interval of 20 (e.g. $X - 20$; X ; $X + 20$). The Contract will have a Payout Criterion of greater than the strike level value.

(iii) Nadex may list additional China 50 Binary Contracts with different ranges of Payout Criteria on a discretionary basis in accordance with the CEA and Commission Regulations.

(g) MINIMUM TICK – The Minimum Tick size for the Bitcoin Binary Contracts shall be \$0.25.

⁸ During the period when the US observes daylight savings time, Daily China 50 Binary Contracts will open and close 1 hour later than their regular defined times.

(i) POSITION LIMIT – The Position Limit for the Bitcoin Binary Contracts shall be 2,500 Contracts.

(j) LAST TRADING DATE – The Last Trading Date in a Series is the same date as the Expiration Date.

(k) SETTLEMENT DATE – The Settlement Date in a Series is the same date as the Expiration Date.

(l) EXPIRATION DATE – The Expiration Date of the Contract will be the date on which the China 50 Expiration Value is released by the Source Agency.

(m) SETTLEMENT VALUE – The Settlement Value is the amount paid to the holder of the in-the-money Contract on the Settlement Date. The Settlement Value of an in-the-money China 50 Binary Contract is \$100.

(n) EXPIRATION VALUE – The Expiration Value is the price or value of the China 50 released by the Source Agency on the Expiration Date. The Expiration Value is calculated by the Source Agency by taking the last twenty-five (25) CHFC trade prices just prior to the close of the trading of the China 50 Binary Contract and removing the highest five (5) CHFC trade prices and the lowest five (5) CHFC trade prices, using the remaining fifteen (15) CHFC trade prices to calculate the Expiration Value. The calculation used is a simple average of all fifteen (15) remaining CHFC trade prices, rounded to one decimal point past the precision of the underlying market.

(o) CONTINGENCIES – If no daily settlement price of the relevant CHFC is announced by the Source Agency, the Settlement Date will be delayed until such settlement price for that Series is released and publicly available.

RULES 12.58 - 12.78 [UNCHANGED]

End of Rulebook

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EXHIBIT C

China 50			
Start Date	End Date	Futures Contract Used for Underlying and Settlement	Reuters Symbol
24-Feb-15	25-Mar-15	SGX® FTSE® Xinhua® China A50 Index March 2015 Future	SFCH5
26-Mar-15	24-Apr-15	SGX® FTSE® Xinhua® China A50 Index April 2015 Future	SFCJ5
25-Apr-15	25-May-15	SGX® FTSE® Xinhua® China A50 Index May 2015 Future	SFCK5
26-May-15	24-Jun-15	SGX® FTSE® Xinhua® China A50 Index June 2015 Future	SFCM5
25-Jun-15	27-Jul-15	SGX® FTSE® Xinhua® China A50 Index July 2015 Future	SFCN5
28-Jul-15	25-Aug-15	SGX® FTSE® Xinhua® China A50 Index August 2015 Future	SFCQ5
26-Aug-15	24-Sep-15	SGX® FTSE® Xinhua® China A50 Index September 2015 Future	SFCU5
25-Sep-15	26-Oct-15	SGX® FTSE® Xinhua® China A50 Index October 2015 Future	SFCV5
27-Oct-15	23-Nov-15	SGX® FTSE® Xinhua® China A50 Index November 2015 Future	SFCX5
24-Nov-15	24-Dec-15	SGX® FTSE® Xinhua® China A50 Index December 2015 Future	SFCZ5