

CX Clearinghouse, L.P.
Governance Arrangements
Submission #2024-01
June 7, 2024

1. Attached are the policies and procedures for governance arrangements for CX Clearinghouse, L.P., (“CXC”) in accordance with CFTC Regulation 39.24(b). They were adopted by the Board of Directors at its meeting on June 4, 2024.
2. The proposed effective date is ten business days after receipt by the Commission of this submission.
3. Attached, please find a certification that: (1) these procedures comply with the Commodity Exchange Act and the Commission’s regulations thereunder; and (2) concurrent with this submission, CXC posted on CXMarkets.com: (i) a notice of their pending certification with the Commission; and (ii) a copy of this submission.
4. A concise explanation and analysis of the operation, purpose, and effect of the amended rules changes appear below.
5. There were no opposing views expressed regarding this amendment.

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**CONCISE EXPLANATION AND ANALYSIS OF THE OPERATION, PURPOSE, AND
EFFECT OF THE CERTIFIED POLICIES AND PROCEDURE AND THEIR COMPLIANCE
WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND
THE COMMISSION’S REGULATIONS THEREUNDER**

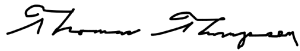
CXC’s governance arrangements prioritize safety and efficiency and support the public interest considerations of clearing members and other relevant stakeholders. The CXC Board of Directors ascertains that CXC’s design, rules, strategy, and major decisions reflect the legitimate interests of clearing members and relevant stakeholders. Major decisions of the Board of Directors are disclosed to clearing members, the CFTC, stakeholders, and the public, as appropriate.

CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT,
7 U.S.C. §7A-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.6, 17
C.F.R. §40.6

I hereby certify that:

(1) the policies and procedures as attached comply with the Commodity Exchange Act and the Commission's regulations thereunder; and

(2) concurrent with this submission, CX Clearinghouse, L.P. posted on its website, CXMarkets.com, (a) a notice of pending certification of the above policies and procedures with the Commission; and (b) a copy of this submission.



By: Thomas Thompson
Title: Chief Compliance Officer
Date: June 7, 2024

CX Clearinghouse, L.P.

Governance Arrangement Requirements

Policies and Procedures in Accordance with Requirements of CFTC Regulation 39.24(b)

Preamble:

CX Clearinghouse's ("CXC") governance arrangements prioritize safety and efficiency and are intended to support the public interest considerations of clearing members and other relevant stakeholders. The Board of Directors ascertains that CXC's design, rules, strategy, and major decisions reflect the legitimate interests of clearing members and relevant stakeholders. Major decisions of the Board of Directors will be disclosed to clearing members, the CFTC, stakeholders, and the public, as appropriate.

Governance arrangements

1. The present and all other governance arrangements will be kept confidential and will be disclosed, as appropriate, to the Commodity Futures Trading Commission ("the Commission" or "CFTC"), other relevant authorities, clearing members, and made public in accordance with other regulatory requirements as set out in the CFTC's regulations.
2. The Board of Directors meets regularly in person or remotely via Teams, Zoom, or other cloud-based video conferencing applications. Meetings are scheduled by the Chairman.
3. Operation, constitution, and authority of the Board of Directors are governed by CXC Rule I-6. Rule I-6(b) provides that of the seven directors on the Board of Directors three (no less than 35%) shall be Public Directors.
4. Pursuant to CXC Rule I-3, the Board of Directors adopts, amends, and repeals Rules.
5. The Board of Directors is charged with managing the business and affairs of CXC.
6. There are no sitting committees established by the CXC Rules; the power of the Board of Directors to establish committees of the Board is implied in the Rules. See, for example, Rule I-8(a).
7. Rule I-1 provides for a President and Vice-President to be appointed by the Board of Directors.
8. Qualifications to be a member of the Board of Directors are set forth in CXC Rule I-8. The definition of Public Directors is also contained in CXC Rule I-8.
9. CXC Rule I-1 defines Emergency and CXC Rule VII-4 provides for the President to take certain respondent actions with the concurrence of the majority of the Board of Directors.
10. In the event of a physical Emergency, as defined in CXC Rule VII-4, the following persons may be authorized to take the actions envisioned by the rule: the President, the chair of the Board of Directors, the most senior available Vice President.