

Eurex Clearing AG
ECAG Rule Certification--DCO Compliance Manual Amendments
March 7, 2025

1. The text of the proposed amendments to the Eurex Clearing AG (“Eurex Clearing”) DCO Compliance Manual (the “Manual”) is appended as Attachment A. Any additions are underlined and any deletions are struck through.
2. The date of intended implementation of the proposed amendments is ten business days following the filing of this submission.
3. Attached please find a certification that: (1) these rules comply with the Commodity Exchange Act (the “Act”), and the Commission’s regulations thereunder; and (2) concurrent with the filing of this submission, Eurex Clearing is posting a copy of this filing with redactions for confidential information to its website at: <https://www.eurex.com/ec-en/rules-regs/regulations/cftc-dco-filings>.
4. A concise explanation and analysis of the operation, purpose, and effect of the amended rule appears below.
5. There were no opposing views expressed regarding these amended rules.
- 6. Confidential treatment pursuant to CFTC Regulation 40.8(c) is requested for Attachment A, which is the Manual and the revisions thereto. Please see attached letter for detailed written justification.**

CONCISE EXPLANATION AND ANALYSIS OF THE OPERATION, PURPOSE, AND EFFECT OF THE PROPOSED RULE AND ITS COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND THE COMMISSION’S REGULATIONS THEREUNDER

Eurex Clearing is proposing the following amendments to the Manual:

1. Non-substantive clarifying amendments throughout the Manual;
2. Additions to specify certain, applicable policies throughout the Manual;
3. DCO Core Principle A and CFTC Regulation 39.10: Greater detail on information contained in the DCO Annual Report and a new provision detailing the annual internal compliance review;
4. DCO Core Principle B and CFTC Regulation 39.11: Updates to conform the Manual more clearly to CFTC Regulation 39.11;
5. DCO Core Principle C and CFTC Regulation 39.12: Updates to conform the Manual more clearly to CFTC Regulation 39.12;
6. DCO Core Principle I, J and CFTC Regulations 39.18, 39.19: Greater detail on the process for event-specific notifications to the CFTC; and
7. DCO Core Principle O and CFTC Regulation 39.24: Greater detail on Eurex Clearing’s procedure for compliance with the risk management committee and risk working group requirements.

Eurex Clearing identifies that the proposed amendments to the Manual are related to corresponding DCO Core Principle and accompanying regulations set forth in the DCO Compliance Manual.

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 amended Rule complies with the Commodity Exchange Act, and the Commission's regulations thereunder; and
- (2) concurrent with the filing of this submission, Eurex Clearing is posting a copy of this filing with redactions for confidential information to its website at:
<https://www.eurex.com/ec-en/rules-regs/regulations/cftc-dco-filings>.

/s/ Eric Seinsheimer

By: Eric Seinsheimer

Title: US CCO, Eurex Clearing AG

Dated: March 7, 2025