

| CORE PRINCIPLES / §49.19 REQUIREMENTS | INFX RESPONSE | SUPPORTING DOCUMENTATION |
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| <p>Anti-trust considerations (Core Principle 1)</p> <p>Unless necessary or appropriate to achieve the purposes of the Act, a registered swap data repository (“SDR”) shall avoid adopting any rule or taking any action that results in any unreasonable restraint on trade, or imposing any material anticompetitive burden on trading, clearing or reporting swaps.</p> | <p>INFX has not adopted any rule, nor has it taken any action that results in any unreasonable restraint of trade, or imposes any material anticompetitive burden on trading, clearing or reporting. INFX rules provide for fair and open access to its trade reporting systems and there are no discriminatory barriers to use the INFX trade reporting system</p> <p>As part of the annual compliance review, the Chief Compliance Officer (‘CCO’) will review the INFX’s compliance with this Core Principle 1.</p> | <p>Exhibit AA – Swap Data Repository Access Agreement</p> <p>Exhibit J – INFX SDR Rulebook</p> <p>Exhibit O – description of INFX SDR Fees</p> |
| <p>Governance Arrangements (Core Principle 2)</p> <p>SDRs shall establish governance arrangements that are transparent to fulfill public interest requirements and to support the objectives of the Federal Government, owners and participants. This includes transparency of governance arrangements, independence issues, expertise and accessibility of the board.</p> | <p>INFX SDR’s governance standards are designed to enable INFX SDR to operate its businesses transparently and to meet its responsibilities in a manner consistent with effective corporate governance practices and sufficient to support the safe and sound operation of an SDR.</p> <p>INFX SDR has established well-defined governance arrangements that include a clear organizational structure with consistent lines of responsibility and effective internal controls which are outlined in various documents including the Directors Code of Ethics, the INFX SDR BOD Guidelines and the INFX Bylaws, Mission Statement of the Board or Directors and its committees.</p> <p>INFX SDR is a 100% owned by Integral Development Corp.</p> | <p>Exhibit AA – Swap Data Repository Access Agreement</p> <p>Exhibit B – fitness standards and composition of the Directors</p> <p>Exhibit C – qualifications of the Chief Compliance Officer of INFX SDR</p> <p>Exhibit D – Directors Code of Ethics, Director and Confidentiality Agreement, INFX Bylaws and Mission Statement</p> <p>Exhibit E – organizational structure of INFX</p> <p>Exhibit H – Articles of Incorporation and Certification of Good Standing</p> |

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| <p>Conflicts of Interest (Core Principle 3)</p> <p>SDRs must establish and enforce rules to minimize conflicts of interest in the decision making process of the SDR and to establish a process for resolving such conflicts.</p> | <p>INFX SDR Board Code of Ethics and the Conflicts of Interest procedures have been developed to minimize actual and potential conflicts of interest in the decision-making process of INFX SDR and to establish a process for resolving such conflicts. The CCO will resolve any such conflicts of interest in consultation with the Regulatory Oversight Committee of the Board of Directors, where necessary. The CCO will also conduct an annual risk assessment in order to identify any conflicts risks.</p> | <p>Exhibit AA – Swap Data Repository Access Agreement</p> <p>Exhibit D – Board of Directors Code of Ethics</p> <p>Exhibit F – INFX SDR procedures used in identifying and resolving conflicts of interest in accordance with this Core Principle 3</p> |
| <p>Financial Resources</p> <p>An SDR must maintain financial resources sufficient to enable it to perform its functions. Financial resources are sufficient for an SDR if their value is at least equal to the total amount that would enable the SDR, or an applicant for SDR registration, to cover operating costs for a period of at least one year, calculated on a rolling basis.</p> | <p>INFX SDR submits with its application pro forma financial statements and projections for operating expenses for the first year of business.</p> | <p>Exhibit AA – Swap Data Repository Access Agreement</p> <p>Exhibit M – pro forma financials for INFX SDR, Inc.¹</p> |

¹ Pursuant to Section 8 of the Commodity Exchange Act, as amended, and Commission Regulation 145.9, INFX SDR has requested confidential treatment of this and other information simultaneously with its application for registration as a swap data repository.

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| <p>Disclosure To Market Participants</p> <p>Registered SDRs shall furnish an appropriate disclosure document setting forth the risks and costs of swap data repository services.</p> | <p>INFX SDR has prepared and will make available on its website a disclosure document that contains the following written information, which shall reasonably enable the reporting entity to identify and evaluate accurately the risks and costs associated with using the INFX SDR Service:</p> <ol style="list-style-type: none"> 1. INFX SDR’s criteria for providing others with access to services offered and data maintained by the SDR; 2. INFX SDR’s criteria for those seeking to connect to or link with the SDR; 3. A description of INFX SDR’s policies and procedures regarding its safeguarding of swap data and operational reliability to protect the confidentiality and security of such data; 4. INFX SDR’s policies and procedures to protect the privacy of any and all swap data that INFX receives from a reporting entity; 5. INFX SDR’s policies and procedures regarding its non-commercial and/or commercial use of the swap data that it receives from a market participant, any registered entity, or any other person. 6. INFX SDR’s dispute resolution procedures; 7. A description of INFX SDR’s services, including any ancillary services; | <p>Exhibit FF-2 – Disclosure Document</p> |

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| | <p>8. INFX SDR’s updated schedule of any fees, which is incorporated by reference from the INFX SDR’s website; and</p> <p>9. A description of INFX SDR’s governance arrangements.</p> | |
| <p>Access and Fees</p> <p>Services provided by SDRs must be available to all market participants on a fair, open and equal basis.</p> | <p>The criteria for INFX SDR Users to access and use the SDR shall be consistently applied and include: completion of an application form, Fitness Review, execution of a User Agreement which includes, among other things, the User’s agreement to comply with INFX rules and security requirements, technical integration capability and payment of applicable fees.</p> <p>INFX’s access criteria (e.g. specifications) and fee schedule will be publicly disseminated through various means but primarily through prominent disclosure on its website and in its Disclosure Document, which it provides to all Users at the time they are solicited or become a User of INFX. Further, members of the public will have the ability to access the INFX website and view Public Data in accordance with Part 43 of Applicable CFTC Regulations at www.infxsdr.com.</p> <p>Fees charged by INFX SDR for access are equitable and charged in a uniform/non-discriminatory manner.</p> | <p>Exhibit AA – Swap Data Repository Access Agreement</p> <p>Exhibit BB – description of limitation on access to the INFX SDR</p> <p>Exhibit O – INFX SDR fee schedule</p> <p>Exhibit EE – INFX SDR procedures for access and denial to the SDR</p> |