



# RTX FINTECH & RESEARCH LLC

Swap Execution Facility

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Christopher J. Kirkpatrick  
Secretary of the Commission  
Commodity Futures Trading Commission

December 11, 2025

## Self-Certification of Rule Amendment Under § 40.6(a): Compliance-Manual Revision

Dear Secretary Kirkpatrick:

RTX Fintech & Research LLC (RTX SEF) intends to implement a change to its compliance manual under 17 CFR § 40.6(a) on December 26, 2025. This amended manual will replace the version that RTX SEF implemented on March 21, 2024.

*Attachment A* contains the amended compliance manual. *Attachment B* contains a redline showing changes against the March 21, 2024 version.

Below is the concise explanation and analysis required under § 40.6(a)(7)(v). RTX SEF is submitting this amendment concurrently with a system-change notification. The revisions align the compliance-manual language with the system change described in that notification. In addition, the amendment updates a reference concerning the Commission's designation of a UPI and product-classification system and updates the document-control page. The substantive changes modify the steps that RTX SEF takes to comply with Part 43 of the Commission's regulations.

The amended compliance manual complies with both the Commodity Exchange Act and the Commission's regulations.

No one has expressed any substantive opposing views that RTX SEF has not already incorporated into the amended rule.

On behalf of RTX SEF, I certify the following:

1. RTX SEF has posted on its website a notice of pending certification with the Commission, along with a redacted copy of this submission.
2. The amended rule complies with the Act and the Commission's regulations.

If you have any questions about this submission, please contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'D. M. Nelson'.

David M. Nelson  
Chief Compliance Officer  
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## **Attachment A**

Amended Compliance Manual (New)

CONTENTS INTENTIONALLY LEFT BLANK:

This attachment is subject to a request for confidential treatment.

## **Attachment B**

Redline of Amended Compliance Manual Against Prior Version

CONTENTS INTENTIONALLY LEFT BLANK:

This attachment is subject to a request for confidential treatment.