Attachment A to RTX SEF Rules

Product Listing for Interest Rate Swaps

RTX Fintech & Research LLC

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1 Fixed-for-Floating IRS–USD SOFR

1.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[1]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

1.1.1 Discussion of Index Reference Prices: SOFR

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The New York Federal Reserve Bank describes SOFR as a broad measure of the cost of borrowing cash overnight collateralized by Treasury securities. SOFR includes all trades in the Broad General Collateral Rate[2] plus bilateral Treasury repurchase agreement (repo) transactions cleared through the Delivery-versus-Payment (DVP) service offered by the Fixed Income Clearing Corporation (FICC), which is filtered to remove a portion of transactions considered "specials."

[1] https://www.bis.org/publ/otc_hy2211.pdf
[2] https://www.newyorkfed.org/markets/reference-rates/bgcr

SOFR was identified by the Alternative Reference Rates Committee (ARRC)[3] as its recommended alternative to U.S. dollar LIBOR for use in certain new U.S. dollar derivatives and other financial contracts.[4] The New York Fed began publication of the SOFR on April 3, 2018. In the production of the Treasury SOFR repo reference rates, the New York Fed has endeavored to adopt policies and procedures consistent with best practices for financial benchmarks, including the IOSCO Principles for Financial Benchmarks.[5]

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

1.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[6]

1.3 Product Description

Participants can trade the product below as of August 29, 2023.

Product	Currency	Index	Authorized DCO
IRS, Fixed/Floating	USD	SOFR	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Fixed-for-Floating IRS, one party pays a fixed rate for the term of the IRS at specific intervals, such as monthly, quarterly, semiannually, or annually. The other party will make floating rate payments indexed to reference rates, such as SOFR. Generally fixed and floating rate payments are compounded and paid net on the longer coupon date.

[3] https://www.newyorkfed.org/arrc/index.html
[4] https://www.newyorkfed.org/medialibrary/microsites/arrc/files/2017/ARRC-press-release-Jun-22-2017.pdf
[5] https://www.bankofengland.co.uk/markets/transition-to-sterling-risk-free-rates-from-libor
[6] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

Note that fixed rate payments can be made on several different day count conventions (e.g., money market = no. of days/365; bond basis = 30/360 fixed; adjusted bond basis = actual no. of days/365 or 366).

1.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

1.5 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

1.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified notional over a term to maturity.
IRS Type	Fixed Rate v Floating Rate Index (SOFR).
Trading Conventions	*Buy/pay* = pay fixed, receive floating index; *sell/receive* = receive fixed, pay floating index; *swap price* is quoted as an outright percentage rate in increments of fractions or decimals of a basis point.
Specific Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries and combinations thereof.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	From 7 days to 51 years, as agreed by the Participants.
Swap Conventions	
Fixed Leg	
Fixed-Leg Payment	Annual, Semiannual, Quarterly, or as agreed by Participants.
Day-Count Conventions	As agreed by Participants and suitable to the Currency's market standards (e.g., 30/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Floating Leg	
Floating-Leg Index	As agreed by Participants and suitable to the Currency's market standards (SOFR).
Payment/Resets	Annual, Semiannual, Quarterly, Monthly, Daily, or as agreed by Participants.
Day-Count Convention	As dictated by market standard for the Floating Index (e.g., Act/360, Act/365, etc.)
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Periodic Settlement Payment/Resets	Payments are settled in accordance with the payment frequency of the swap.
Fixed Leg	The payment amount of the Fixed Leg is based on Notional, Payment Frequency, Day Count Convention, and Fixed Interest Rate.
Floating Leg	The payment amount of the Floating Leg is based on Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.

2 Fixed-for-Floating IRS–USD Fed Funds

2.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is among the largest derivatives markets in the world, as reflected in the over-the-counter derivatives statistics published by the Bank for International Settlements.

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

2.1.1 Discussion of Index Reference Prices: Fed Funds

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the Federal Reserve Bank of New York's Secured Overnight Financing Rate (SOFR)), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The USD-Federal Funds-OIS Compound is the rate for the reset date (i.e., the rate of return of a daily compound interest investment). The reference rate for the calculation of interest is the daily effective federal funds rate determined by the Federal Reserve Bank of New York as the volume-weighted median of transaction-level data collected from depository institutions reported in the FR 2420 Report of Selected Money Market Rates. The FR 2420 is a transaction-based report that collects daily liability data on federal funds, Eurodollars, certificates of deposit and time deposits, and selected deposits from (1) domestically chartered commercial banks and thrifts that have $18 billion or more in total assets, or $5 billion or more in assets and meet

certain unsecured borrowing activity thresholds, and (2) U.S. branches and agencies of foreign banks with total third-party assets of $2.5 billion or more. The Federal Reserve Bank of New York calculates and publishes the rate each New York business day. The rate is widely available and unbiased. The calculation of the compounded floating rate is set forth in the 2021 ISDA Interest Rate Derivatives Definitions, as amended and supplemented from time to time.

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

2.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available to Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[7]

2.3 Product Description

Participants can trade the product below as of October 26, 2026.

Product	Currency	Index	Authorized DCO
IRS, Fixed/Floating	USD	Fed Funds	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Fixed-for-Floating IRS, one party pays a fixed rate for the term of the IRS at specific intervals, such as monthly, quarterly, semiannually, or annually. The other party will make floating rate payments indexed to reference rates, such as Fed Funds. Generally fixed and floating rate payments are compounded and paid net on the longer coupon date.

Note that fixed rate payments can be made on several different day-count conventions (e.g., Act/360, Act/365, and 30/360).

[7] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

2.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

2.5 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Business-Day Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Business-Day Convention will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Business-Day Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Part 150 of the Commission's regulations, as applicable, sets forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

2.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified notional over a term to maturity.
IRS Type	Fixed Rate v Floating Rate Index (Fed Funds).
Trading Conventions	*Buy/pay* = pay fixed, receive floating index; *sell/receive* = receive fixed, pay floating index; *swap price* is quoted as an outright percentage rate in increments of fractions or decimals of a basis point.
Specific Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries and combinations thereof.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	From 7 days to 51 years, as agreed by the Participants.
Swap Conventions	
Fixed Leg	
Fixed-Leg Payment	Annual, Semiannual, Quarterly, or as agreed by Participants.
Day-Count Conventions	As agreed by Participants and suitable to the Currency's market standards (e.g., 30/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Floating Leg	
Floating-Leg Index	As agreed by Participants and suitable to the Currency's market standards (Fed Funds).
Payment/Resets	Annual, Semiannual, Quarterly, Monthly, Daily, or as agreed by Participants.
Day-Count Convention	As dictated by market standard for the Floating Index (e.g., Act/360, Act/365, etc.)
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Periodic Settlement Payment/Resets	Payments are settled in accordance with the payment frequency of the swap.
Fixed Leg	The payment amount of the Fixed Leg is based on Notional, Payment Frequency, Day Count Convention, and Fixed Interest Rate.
Floating Leg	The payment amount of the Floating Leg is based on Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.

3 Fixed-for-Floating IRS–EUR EURIBOR

3.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[8]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

3.1.1 Discussion of Index Reference Prices: EURIBOR

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The Euro Interbank Offered Rate (EURIBOR) provides an indication of the average rate at which Eurozone banks offer to lend unsecured funding to other banks in the Euro wholesale money market for a given period of time. The European Money Market Institute (EMMI) has been granted authorization by the Belgian Financial Services and Markets Authority (FSMA) for the provision and administration of EURIBOR in compliance with the EU Benchmark Regulation. A representative sample of panel banks that are active participants in the Euro money markets provide daily quotes for five defined tenors (one week, one month, three

[8] https://www.bis.org/publ/otc_hy2211.pdf

months, six months, and twelve months) at which interbank term deposits, denominated in Euro, are being offered within the euro zone between prime banks. The EMMI EURIBOR Steering Committee defines and reviews the size and composition of the panel and monitors ongoing compliance with and adequacy of both the panel criteria and the EURIBOR Governance Framework, including the EURIBOR Benchmark Determination Methodology. Panel banks submit their contribution data each day, rounded to two decimal places. The highest and lowest 15% of the final contribution rates of all panel banks are eliminated for each tenor. The remaining rates are then arithmetically averaged and rounded to three decimal places. The published EURIBOR rates follow euro money market convention for spot settlement (T+2) and an actual/360 day-count convention.

The EURIBOR rate has been published since December 30, 1998. The EURIBOR is widely accepted as a reliable interbank rate for the Euro money market and is widely distributed by Thomson Reuters. Additional information regarding the selection of panel banks, the calculation of EURIBOR rates, systemic safeguards in place to ensure the reliability of the published rates, and the governance framework may be accessed on EMMI's website.[9]

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

3.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[10]

[9] https://www.emmi-benchmarks.eu/euribor-org/about-euribor.html
[10] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

3.3 Product Description

Participants can trade the product below as of August 29, 2023.

Product	Currency	Index	Authorized DCO
IRS, Fixed/Floating	EUR	EURIBOR	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Fixed-for-Floating IRS, one party pays a fixed rate for the term of the IRS at specific intervals, such as monthly, quarterly, semiannually, or annually. The other party will make floating rate payments indexed to reference rates, such as EURIBOR. Generally fixed and floating rate payments are compounded and paid net on the longer coupon date.

Note that fixed rate payments can be made on several different day count conventions (e.g., money market = no. of days/365; bond basis = 30/360 fixed; adjusted bond basis = actual no. of days/365 or 366).

3.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

3.5 General Definitions

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Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

3.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified notional over a term to maturity.
IRS Type	Fixed Rate vs. Floating Rate Index (EURIBOR).
Trading Conventions	*Buy/pay* = pay fixed, receive floating index; *sell/receive* = receive fixed, pay floating index; *swap price* is quoted as an outright percentage rate in increments of fractions or decimals of a basis point.
Specific Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries and combinations thereof.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	From 7 days to 51 years, as agreed by the Participants.
Swap Conventions	
Fixed Leg	
Fixed-Leg Payment	Annual, Semiannual, Quarterly, or as agreed by Participants.
Day-Count Conventions	As agreed by Participants and suitable to the Currency's market standards (e.g., 30/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Floating Leg	
Floating-Leg Index	As agreed by Participants and suitable to the Currency's market standards (EURIBOR).
Payment/Resets	Annual, Semiannual, Quarterly, Monthly, Daily, or as agreed by Participants.
Day-Count Convention	As dictated by market standard for the Floating Index (e.g., Act/360, Act/365, etc.)
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Periodic Settlement Payment/Resets	Payments are settled in accordance with the payment frequency of the swap.
Fixed Leg	The payment amount of the Fixed Leg is based on Notional, Payment Frequency, Day Count Convention, and Fixed Interest Rate.
Floating Leg	The payment amount of the Floating Leg is based on Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.

4 Fixed-for-Floating IRS–EUR EuroSTR

4.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[11]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

4.1.1 Discussion of Index Reference Prices: EuroSTR

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The EuroSTR euro short-term rate is administered and published by the European Central Bank (ECB). The ECB has designed EuroSTR to be an overnight rate consistent with international best practice set out in the International Organization of Securities Commissions (IOSCO) Principles for Financial benchmarks. The euro short-term rate was first published on October 2, 2019. The euro short-term rate (EuroSTR) reflects the wholesale euro unsecured overnight borrowing costs of banks located in the euro area. The EuroSTR is published on each defined business day based on transactions conducted and settled on the previous defined

[11] https://www.bis.org/publ/otc_hy2211.pdf

business day (the reporting date "T") with a maturity date of T+1, which are deemed to have been executed at arm's length and thus reflect market rates in an unbiased way.

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

4.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[12]

4.3 Product Description

Participants can trade the product below as of August 29, 2023.

Product	Currency	Index	Authorized DCO
IRS, Fixed/Floating	EUR	EuroSTR	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Fixed-for-Floating IRS, one party pays a fixed rate for the term of the IRS at specific intervals, such as monthly, quarterly, semiannually, or annually. The other party will make floating rate payments indexed to reference rates, such as EuroSTR. Generally fixed and floating rate payments are compounded and paid net on the longer coupon date.

Note that fixed rate payments can be made on several different day count conventions (e.g., money market = no. of days/365; bond basis = 30/360 fixed; adjusted bond basis = actual no. of days/365 or 366).

[12] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

4.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

4.5 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

4.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified notional over a term to maturity.
IRS Type	Fixed Rate vs. Floating Rate Index (EuroSTR).
Trading Conventions	*Buy/pay* = pay fixed, receive floating index; *sell/receive* = receive fixed, pay floating index; *swap price* is quoted as an outright percentage rate in increments of fractions or decimals of a basis point.
Specific Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries and combinations thereof.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	From 7 days to 51 years, as agreed by the Participants.
Swap Conventions	
Fixed Leg	
Fixed-Leg Payment	Annual, Semiannual, Quarterly, or as agreed by Participants.
Day-Count Conventions	As agreed by Participants and suitable to the Currency's market standards (e.g., 30/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Floating Leg	
Floating-Leg Index	As agreed by Participants and suitable to the Currency's market standards (EuroSTR).
Payment/Resets	Annual, Semiannual, Quarterly, Monthly, Daily, or as agreed by Participants.
Day-Count Convention	As dictated by market standard for the Floating Index (e.g., Act/360, Act/365, etc.)
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Periodic Settlement Payment/Resets	Payments are settled in accordance with the payment frequency of the swap.
Fixed Leg	The payment amount of the Fixed Leg is based on Notional, Payment Frequency, Day Count Convention, and Fixed Interest Rate.
Floating Leg	The payment amount of the Floating Leg is based on Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.

5 Fixed-for-Floating IRS–GBP SONIA

5.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[13]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

5.1.1 Discussion of Index Reference Prices: SONIA

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

SONIA is governed, administered, and published daily by the Bank of England. SONIA is based on actual transactions and reflects the average of the interest rates that banks pay to borrow sterling overnight from other financial institutions and other institutional investors.

SONIA is the Working Group on Sterling Risk Free Reference Rates' preferred benchmark for the transition to sterling risk-free rates from Libor.[14]

[13] https://www.bis.org/publ/otc_hy2211.pdf
[14] https://www.bankofengland.co.uk/markets/transition-to-sterling-risk-free-rates-from-libor

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

5.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[15]

5.3 Product Description

Participants can trade the product below as of August 29, 2023.

Product	Currency	Index	Authorized DCO
IRS, Fixed/Floating	GBP	SONIA	LCH Ltd. or CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Fixed-for-Floating IRS, one party pays a fixed rate for the term of the IRS at specific intervals, such as monthly, quarterly, semiannually, or annually. The other party will make floating rate payments indexed to reference rates, such as SONIA. Generally fixed and floating rate payments are compounded and paid net on the longer coupon date.

Note that fixed rate payments can be made on several different day count conventions (e.g., money market = no. of days/365; bond basis = 30/360 fixed; adjusted bond basis = actual no. of days/365 or 366).

5.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

[15] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

5.5 GBP IRS Trading Days & Hours

Trading on the Platform for Sterling Interest Rate Swaps will take place on each Business Day, other than such days when NYSE Liffe or the Clearing Organization is closed for business. RTX SEF reserves the right to determine additional Trading Days after prior announcement thereof to the Participants. For the purposes of this rule, "Business Day" means every weekday that is not a holiday in New York.

5.6 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

5.7 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified notional over a term to maturity.
IRS Type	Fixed Rate vs. Floating Rate Index (SONIA).
Trading Conventions	*Buy/pay* = pay fixed, receive floating index; *sell/receive* = receive fixed, pay floating index; *swap price* is quoted as an outright percentage rate in increments of fractions or decimals of a basis point.
Specific Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries and combinations thereof.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	From 7 days to 51 years, as agreed by the Participants.
Swap Conventions	
Fixed Leg	
Fixed-Leg Payment	Annual, Semiannual, Quarterly, or as agreed by Participants.
Day-Count Conventions	As agreed by Participants and suitable to the Currency's market standards (e.g., 30/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Floating Leg	
Floating-Leg Index	As agreed by Participants and suitable to the Currency's market standards (SONIA).
Payment/Resets	Annual, Semiannual, Quarterly, Monthly, Daily, or as agreed by Participants.
Day-Count Convention	As dictated by market standard for the Floating Index (e.g., Act/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Periodic Settlement Payment/Resets	Payments are settled in accordance with the payment frequency of the swap.
Fixed Leg	The payment amount of the Fixed Leg is based on Notional, Payment Frequency, Day Count Convention, and Fixed Interest Rate.
Floating Leg	The payment amount of the Floating Leg is based on Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.

6 Fixed-for-Floating IRS–JPY TONA

6.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[16]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

6.1.1 Discussion of Index Reference Prices: TONA

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The Tokyo Overnight Average Rate (TONA) is the JPY near risk-free rate calculated as the volume-weighted average of all uncollateralized overnight transactions settled on the same day as the trade date and maturing the following business day in the uncollateralized call money market. Specifically, the volume-weighted average call rate is the average call rate weighted by the volume of the transactions corresponding to each rate. The rate is calculated by dividing the sum of the product of each transaction volume and the corresponding rate by the sum of the overall transaction volumes, based on data submitted by active institutional information

[16] https://www.bis.org/publ/otc_hy2211.pdf

providers (rounded off to three decimal places). The TONA rate was introduced in 2016 and is administered and published by the Bank of Japan on its website[17] at around 10 a.m. Tokyo time for the previous business day.

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

6.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[18]

6.3 Product Description

Participants can trade the product below as of August 29, 2023.

Product	Currency	Index	Authorized DCO
IRS, Fixed/Floating	JPY	TONA	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Fixed-for-Floating IRS, one party pays a fixed rate for the term of the IRS at specific intervals, such as monthly, quarterly, semiannually, or annually. The other party will make floating rate payments indexed to reference rates, such as TONA. Generally fixed and floating rate payments are compounded and paid net on the longer coupon date.

Note that fixed rate payments can be made on several different day count conventions (e.g., money market = no. of days/365; bond basis = 30/360 fixed; adjusted bond basis = actual no. of days/365 or 366).

[17] http://www3.boj.or.jp/market/en/menu_m.htm
[18] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

6.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

6.5 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

6.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange a stream of cash flows by applying a fixed and floating interest rate to a specified notional over a term to maturity.
IRS Type	Fixed Rate vs. Floating Rate Index (TONA).
Trading Conventions	*Buy/pay* = pay fixed, receive floating index; *sell/receive* = receive fixed, pay floating index; *swap price* is quoted as an outright percentage rate in increments of fractions or decimals of a basis point.
Specific Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries and combinations thereof.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	From 7 days to 41 years, as agreed by the Participants.
Swap Conventions	
Fixed Leg	
Fixed-Leg Payment	Annual, Semiannual, Quarterly, or as agreed by Participants.
Day-Count Conventions	As agreed by Participants and suitable to the Currency's market standards (e.g., 30/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Floating Leg	
Floating-Leg Index	As agreed by Participants and suitable to the Currency's market standards (TONA).
Payment/Resets	Annual, Semiannual, Quarterly, Monthly, Daily, or as agreed by Participants.
Day-Count Convention	As dictated by market standard for the Floating Index (e.g., Act/360, Act/365, etc.)
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business-Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to the Currency's market standards.
Periodic Settlement Payment/Resets	Payments are settled in accordance with the payment frequency of the swap.
Fixed Leg	The payment amount of the Fixed Leg is based on Notional, Payment Frequency, Day Count Convention, and Fixed Interest Rate.
Floating Leg	The payment amount of the Floating Leg is based on Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index and Floating Reset Dates.

7 Basis Swap–USD SOFR vs. Fed Funds

7.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[19]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

7.1.1 Discussion of Index Reference Prices: SOFR & Fed Funds

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The New York Federal Reserve Bank describes the SOFR as a broad measure of the cost of borrowing cash overnight collateralized by Treasury securities. The SOFR includes all trades in the Broad General Collateral Rate[20] plus bilateral Treasury repurchase agreement (repo) transactions cleared through the Delivery-versus-Payment (DVP) service offered by the Fixed Income Clearing Corporation (FICC), which is filtered to remove a portion of transactions considered "specials."

[19] https://www.bis.org/publ/otc_hy2211.pdf
[20] https://www.newyorkfed.org/markets/reference-rates/bgcr

SOFR was identified by the Alternative Reference Rates Committee (ARRC)[21] as its recommended alternative to U.S. dollar LIBOR for use in certain new U.S. dollar derivatives and other financial contracts.[22] The New York Fed began publication of the SOFR on April 3, 2018. In the production of the Treasury SOFR repo reference rates, the New York Fed has endeavored to adopt policies and procedures consistent with best practices for financial benchmarks, including the IOSCO Principles for Financial Benchmarks.[23]

The USD-Federal Funds-H.15-OIS-COMPOUND is the rate for the reset date (i.e., the rate of return of a daily compound interest investment). The reference rate for the calculation of interest is the daily effective federal funds rate determined by the Federal Reserve Bank of New York as the volume-weighted median of transaction-level data collected from depository institutions reported in the FR 2420 Report of Selected Money Market Rates. The FR 2420 is a transaction-based report that collects daily liability data on federal funds, Eurodollars, certificates of deposit and time deposits, and selected deposits from (1) domestically chartered commercial banks and thrifts that have $18 billion or more in total assets, or $5 billion or more in assets and meet certain unsecured borrowing activity thresholds, and (2) U.S. branches and agencies of foreign banks with total third-party assets of $2.5 billion or more. The Federal Reserve Bank of New York calculates and published the rate each New York business day. The rate is widely available and unbiased. The calculation formula may be found in "Supplement number 6 to the 2000 ISDA Definitions and Annex to the 2000 ISDA Definitions."[24]

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

7.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[25]

[21] https://www.newyorkfed.org/arrc/index.html
[22] https://www.newyorkfed.org/medialibrary/microsites/arrc/files/2017/ARRC-press-release-Jun-22-2017.pdf
[23] https://www.bankofengland.co.uk/markets/transition-to-sterling-risk-free-rates-from-libor
[24] https://www.isda.org/book/supplements-to-the-2000-isda-definitions-and-annex-to-the-2000-isda-definitions/
[25] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

7.3 Product Description

Participants can trade the product below as of August 29, 2023.

Product	Currency	Index	Authorized DCO
Basis Swap, Floating/Floating	USD	SOFR, Fed Funds	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Basis Swap IRS, one party pays a floating rate for the term of the IRS indexed to a floating reference rate. The other party will also pay a floating rate indexed to a reference rate in a different tenor. For example, in a 2-year term IRS, Party A pays SOFR in a particular tenor, Party B pays Fed Funds to the same or a different tenor. Generally payments of the SOFR will be compounded and offset on the coupon dates.

7.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

7.5 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

7.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange two streams of floating cash flows on a specified notional over a term to maturity.
Basis Spread	A spread between two Floating Rate Indices (SOFR & Fed Funds) of the same currency (USD).
Basis Spread Types	3v1, 3v6 or 6v3, 3v12, 6v12 or other combinations of floating indices as agreed by Participants.
Specific Trade Types	The following swap types may be executed: Outrights (Spot and Forward starting), Curve (tenor) Spreads, Butterflies.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	As agreed by the Participants. A contract can have a Tenor from 3 months to 51 years.
Trading Conventions	*Buy/pay* = Pay Floating Fed Funds Index Flat, Receive Floating SOFR Index + Basis; *spread sell/receive* = Receive Floating Index Fed Funds Flat, Pay Floating SOFR Index + Basis Spread; *basis spread price* quoted in increments of fractions or decimals of a basis point. Leg 1 is usually the longer underlying index tenor (e.g., 3v1 rather than 1v3). Thus the 3M index is paid flat and the spread is added to the 1m index. The shorter index can be compounded, i.e. Q/Q = 3m index vs 1 quarterly payment consisting of 3 compounded 1m index settings OR the shorter index can be 3 separate monthly payments.
Swap Conventions	
Floating Legs 1 & 2	
Index	As agreed by Participants and suitable to the Currency's market standards (SOFR and Fed Funds).
Payment/Resets	Annual, Semi-Annual, Quarterly, Monthly, Daily or as agreed by Participants.
Day-Count Conventions	As dictated by market standard for each Index (e.g., Act/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to each Currency's market standards.
Periodic Settlement Payment/Resets	
Floating Legs 1 & 2	The payment amount of the Floating Leg is based on: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index, and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.

8 Basis Swap–EUR EURIBOR vs. EuroSTR

8.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[26]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

8.1.1 Discussion of Index Reference Prices: EURIBOR & EuroSTR

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The EuroSTR euro short-term rate is administered and published by the European Central Bank (ECB). The ECB has designed EuroSTR to be an overnight rate consistent with international best practice set out in the International Organization of Securities Commissions (IOSCO) Principles for Financial benchmarks. The euro short-term rate was first published on October 2, 2019. The euro short-term rate (EuroSTR) reflects the wholesale euro unsecured overnight borrowing costs of banks located in the euro area. The EuroSTR is published on each defined business day based on transactions conducted and settled on the previous defined

[26] https://www.bis.org/publ/otc_hy2211.pdf

business day (the reporting date "T") with a maturity date of T+1, which are deemed to have been executed at arm's length and thus reflect market rates in an unbiased way.

The Euro Interbank Offered Rate (EURIBOR) provides an indication of the average rate at which Eurozone banks offer to lend unsecured funding to other banks in the Euro wholesale money market for a given period of time. The European Money Market Institute (EMMI) has been granted authorization by the Belgian Financial Services and Markets Authority (FSMA) for the provision and administration of EURIBOR in compliance with the EU Benchmark Regulation. A representative sample of panel banks that are active participants in the Euro money markets provide daily quotes for five defined tenors (one week, one month, three months, six months, and twelve months) at which interbank term deposits, denominated in Euro, are being offered within the euro zone between prime banks. The EMMI EURIBOR Steering Committee defines and reviews the size and composition of the panel and monitors ongoing compliance with and adequacy of both the panel criteria and the EURIBOR Governance Framework, including the EURIBOR Benchmark Determination Methodology. Panel banks submit their contribution data each day, rounded to two decimal places. The highest and lowest 15% of the final contribution rates of all panel banks are eliminated for each tenor. The remaining rates are then arithmetically averaged and rounded to three decimal places. The published EURIBOR rates follow euro money market convention for spot settlement (T+2) and an actual/360 day-count convention.

The EURIBOR rate has been published since December 30, 1998. The EURIBOR is widely accepted as a reliable interbank rate for the Euro money market and is widely distributed by Thomson Reuters. Additional information regarding the selection of panel banks, the calculation of EURIBOR rates, systemic safeguards in place to ensure the reliability of the published rates, and the governance framework may be accessed on EMMI's website.[27]

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

8.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[28]

[27] https://www.emmi-benchmarks.eu/euribor-org/about-euribor.html
[28] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

8.3 Product Description

Participants can trade the product below as of August 29, 2023.

Product	Currency	Index	Authorized DCO
Basis Swap, Floating/Floating	EUR	EURIBOR, EuroSTR	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Basis Swap IRS, one party pays a floating rate for the term of the IRS indexed to a floating reference rate. The other party will also pay a floating rate indexed to a reference rate in a different tenor.

8.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

8.5 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

8.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange two streams of floating cash flows on a specified notional over a term to maturity.
Basis Spread	A spread between two Floating Rate Indices (EURIBOR & EuroSTR) of the same currency (EUR).
Basis Spread Types	3v1, 3v6 or 6v3, 3v12, 6v12 or other combinations of floating indices as agreed by Participants.
Specific Trade Types	The following swap types may be executed: Outrights (Spot and Forward starting), Curve (tenor) Spreads, Butterflies.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	As agreed by the Participants. A contract can have a Tenor from 3 months to 51 years.
Trading Conventions	*Buy/pay* = Pay Floating EURIBOR Index Flat, Receive Floating EuroSTR Index + Basis; *spread sell/receive* = Receive Floating Index EURIBOR Flat, Pay Floating EuroSTR Index + Basis Spread; *basis spread price* Quoted in increments of fractions or decimals of a basis point. Leg 1 is usually the longer underlying index tenor (e.g., 3v1 rather than 1v3). Thus the 3M index is paid flat and the spread is added to the 1m index. The shorter index can be compounded, i.e. Q/Q = 3m index vs 1 quarterly payment consisting of 3 compounded 1m index settings OR the shorter index can be 3 separate monthly payments.
Swap Conventions	
Floating Legs 1 & 2	
Index	As agreed by Participants and suitable to the Currency's market standards (EURIBOR & EuroSTR).
Payment/Resets	Annual, Semi-Annual, Quarterly, Monthly, Daily or as agreed by Participants.
Day-Count Conventions	As dictated by market standard for each Index (e.g., Act/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to each Currency's market standards.
Periodic Settlement Payment/Resets	
Floating Legs 1 & 2	The payment amount of the Floating Leg is based on: Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index, and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.

9 Basis Swap–USD BSBY vs. SOFR

9.1 Discussion: Contracts Not Readily Susceptible to Manipulation

The interest rate swap (IRS) market is considered the largest derivative market in the world, with an estimated 632 trillion in notional principal outstanding as of June 2022 according to the Bank for International Settlements.[29]

IRS are cash-settled, so there is no deliverable supply to be manipulated. IRS are widely used by corporations, insurance companies, banks, and governments to transfer and manage interest rate risk. Interest-rate-linked financial instruments (e.g., bonds, loans, government interest-bearing instruments, and interest-rate-sensitive instruments) are not easily susceptible to manipulation because of the size and liquidity of the cash market for such instruments. Furthermore, IRS-associated interest rate futures contracts, loans, cleared swaps, and cash and futures markets for government debt securities offer a deep liquidity pool to hedge and risk-manage swaps based on such rates indexes.

RTX SEF will monitor trading in these swaps. RTX SEF has a comprehensive surveillance program and rules to prevent RTX SEF Participants from engaging in manipulative activity and possesses discretion to impose fines and disciplinary sanctions on its Participants.

9.1.1 Discussion of Index Reference Prices: BSBY & SOFR

RTX SEF limits the indexes underlying its interest rate swap offerings to well-established, publicly available third-party interest rate market benchmarks. Some are published by central banks (such as the United States Federal Reserve Secured Overnight Financing Rate (SOFR) rate), while others are calculated and published by reliable independent providers (such as trade associations, exchanges, or other third parties). The interest rate reference prices underlying swaps on RTX SEF are the timeliest, most widely recognized, and reliable benchmarks for interest rates in their respective markets. The index levels are readily available and commercially acceptable as benchmarks for borrowers, lenders, investors, portfolio managers, governments, and public policy makers.

The New York Federal Reserve Bank describes the SOFR as a broad measure of the cost of borrowing cash overnight collateralized by Treasury securities. The SOFR includes all trades in the Broad General Collateral Rate[30] plus bilateral Treasury repurchase agreement (repo) transactions cleared through the Delivery-versus-Payment (DVP) service offered by the Fixed Income Clearing Corporation (FICC), which is filtered to remove a portion of transactions considered "specials."

[29] https://www.bis.org/publ/otc_hy2211.pdf
[30] https://www.newyorkfed.org/markets/reference-rates/bgcr

SOFR was identified by the Alternative Reference Rates Committee (ARRC)[31] as its recommended alternative to U.S. dollar LIBOR for use in certain new U.S. dollar derivatives and other financial contracts.[32] The New York Fed began publication of the SOFR on April 3, 2018. In the production of the Treasury SOFR repo reference rates, the New York Fed has endeavored to adopt policies and procedures consistent with best practices for financial benchmarks, including the IOSCO Principles for Financial Benchmarks.[33]

BSBY is a proprietary index calculated daily and published at 8:00 a.m. ET on each U.S. business day by Bloomberg Index Services Limited (BISL), Bloomberg's authorized benchmark administrator. BSBY provides a series of credit sensitive reference rates that incorporate bank credit spreads and defines a forward term structure. BSBY also seeks to measure the average yields at which large global banks access USD senior unsecured marginal wholesale funding. BSBY uses an advanced curve-fitting methodology to calculate overnight, 1-month, 3-month, 6-month, and 12-month yields. The index is based on aggregated anonymized data anchored in transactions and executable quotes sourced from Bloomberg's electronic trading solutions and trades of short-term senior unsecured bank corporate bonds reported by FINRA. BSBY is based on transactions of instruments used by banks to fund themselves, includes a systemic credit spread in its rate, and can be used as a supplement to SOFR in the lending market. The BSBY methodology has several protections against manipulation: the weight of each transaction is capped at $500 million to help ensure stability and reduce the risk of the rate being unduly influenced by any single data point; there is a single issuer cap of 20% to ensure any given BSBY tenor is an average rate across an appropriately broad sample; all yields above the 75th volume percentile and below the 25th volume percentile are eliminated from the final calculation. BISL provides robust governance and oversight over its benchmark offerings. BSBY's transaction-based inputs, robust construction, and resilient methodology are designed to meet the high standards of both the BMR and the IOSCO principles for financial benchmarks (IOSCO Principles). BISL confirmed BSBY adheres to the IOSCO Principles[34] and an independent assurance report is available.[35]

RTX SEF believes that the large number of participants in each market and the calculation of each index by well-known, independent third parties further limits the susceptibility of manipulation of these indexes. RTX SEF believes that such benchmark indexes (many of which also underlie liquid interest rate futures contracts on major Designated Contract Markets) are not readily susceptible to manipulation due to the large number of index participants, ubiquity, and broad-market nature.

[31] https://www.newyorkfed.org/arrc/index.html
[32] https://www.newyorkfed.org/medialibrary/microsites/arrc/files/2017/ARRC-press-release-Jun-22-2017.pdf
[33] https://www.bankofengland.co.uk/markets/transition-to-sterling-risk-free-rates-from-libor
[34] https://www.bloomberg.com/press-releases/2021-04-06/bloomberg-confirms-its-bsby-short-term-credit-sensitive-index-adheres-to-iosco-principles
[35] https://assets.bbhub.io/professional/sites/27/Bloomberg_BSBY_Report_070121-1.pdf

9.2 MAT Contracts: Swaps Subject to the Trade Execution Requirement

For interest rate swaps that are Made Available Trade (MAT)—that is, subject to the Trade Execution Requirement under CEA section 2(h)(8)—see the industry filings posted on the CFTC's website.[36]

9.3 Product Description

Participants can trade the product below as of August 30, 2023.

Product	Currency	Index	Authorized DCO
Basis Swap, Floating/Floating	USD	SOFR, BSBY	LCH Ltd./CME Inc.

An IRS is where two parties agree to exchange interest rate cash flows, based on a specified notional amount from a fixed rate to a floating rate (or vice versa) or from one floating rate to another for a predetermined term. In a Basis Swap IRS, one party pays a floating rate for the term of the IRS indexed to a floating reference rate. The other party will also pay a floating rate indexed to a reference rate in a different tenor.

9.4 Clearing Required

The listed specifications for this product represent the customary attributes of the swap agreements. Because RTX SEF only permits trading in cleared products, all attributes must conform to the specifications of the authorized DCOs.

[36] https://www.cftc.gov/IndustryOversight/IndustryFilings/index.htm

9.5 General Definitions

Unless stated otherwise in the product specifications or terms and conditions, below are the general definitions for products listed on RTX SEF.

Item	Description
Swap Transaction	Any transaction that is a rate swap, basis swap, or similar transaction (and any combination thereof).
Fixed-Rate Payer	A party obligated to make payments calculated by reference to a fixed rate.
Floating-Rate Payer	A party obligated to make payments calculated by reference to a floating rate.
Floating-Rate Index	Depends on currency and as agreed by Participants.
Quoting Convention/Min. Increment	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Min. Size	Depends on Currency, Index, and Tenor for Electronic Order Book or as agreed by Participants for Voice Order Book.
Confirmation	Documents or other confirming evidence exchanged between the counterparties that confirm all the terms of the Swap Transaction.
Business Day	A day on which banks settle payments.
Day-Count Convention	The convention used for adjusting any relevant date that would otherwise fall on a non-Business Day. Day count will be specific to the individual product specification.
Holiday Calendar	Applied in accordance with the country currency denoted for the instrument.
Term (Tenor)	The total period of the Swap Transaction, starting on the Effective Date and ending on the Termination Date.
Notional Types	*Bullet* = notional remains constant over term of swap; *amortizing* = notional declines over term of swap; *accreting* = notional increases over term of swap.
Effective (Start) Date	The first date of the Term of the Swap Transaction, Spot or Forward starting, subject to the agreed Day-Count Convention.
Termination Date	The last day of the Term of the Swap Transaction.
Maturity Date	Start Date + Term (Tenor).
First Fixing Date	The first Index Fixing Date is zero, one, or two business days (depends on that Currency's market standard and according to agreed Holiday calendars) prior to the Start Date of the Swap.

Item	Description
Trade Types	The following swap types may be executed: Outright (Spot and Forward starting), Curve (tenor) Spreads, Butterflies, Spreads between different floating Indices, Spreads to Futures, Spreads to Treasuries, and combinations thereof.
Trade Start Types	*Spot* = a swap where the Effective Date is T+0 (e.g., GBP), T+2 (e.g., USD, EUR, JPY) from the trade date, depending on Currency and floating Index market standard; *forward* = a swap where the Effective Date is after the Effective Date for a Spot Starting swap of that Currency and floating Index.
Settlement Procedure	As determined by the Clearing Organization.
Block Trades	Block Trades may be submitted pursuant to RTX SEF Rule 510.
Position Limits	Parts 150 and 151 of the Commission's regulations, as applicable, set forth the Commission's rules regarding speculative position limits. The CFTC does not require speculative position limits for IRS.
Trading Hours	The operating hours of RTX SEF, published on RTX SEF's website.

Table: General Definitions Cont'd

9.6 Product Specifications & Terms and Conditions

Item	Description
Contract Definition	An agreement to exchange two streams of floating cash flows on a specified notional over a term to maturity.
Basis Spread	A spread between two Floating Rate Indices (BSBY & SOFR) of the same currency (USD).
Basis Spread Types	1v3 or as agreed by Participants, subject to DCO rules.
Specific Trade Types	The following swap types may be executed: Outrights (Spot and Forward starting), Curve (tenor) Spreads, Butterflies.
Trade Start Dates	Spot or Forward Start Date or as agreed by the Participants, subject to DCO rules.
Swap Term (Tenor)	As agreed by the Participants. A contract can have a Tenor from 3 months to 11 years.
Trading Conventions	*Buy/pay* = pay floating BSBY Index Flat, Receive Floating SOFR Index + Basis; *spread sell/receive* = receive Floating Index BSBY Flat, Pay Floating SOFR Index + Basis Spread; *basis spread price* quoted in increments of fractions or decimals of a basis point. Leg 1 is usually the longer underlying index tenor (e.g., 3v1 rather than 1v3). Thus the 3M index is paid flat and the spread is added to the 1m index. The shorter index can be compounded, i.e. Q/Q = 3m index vs 1 quarterly payment consisting of 3 compounded 1m index settings OR the shorter index can be 3 separate monthly payments.
Swap Conventions	
Floating Legs 1 & 2	
Index	As agreed by Participants and suitable to the Currency's market standards (BSBY & SOFR).
Payment/Resets	Annual, Semi-Annual, Quarterly, Monthly, Daily or as agreed by Participants.
Day-Count Conventions	As dictated by market standard for each Index (e.g., Act/360, Act/365, etc.).
Holiday Calendar	As agreed by Participants and suitable to the Currency's market standards.
Fixing Calendar	As agreed by Participants and suitable to the Currency's market standards.
Business Day Conventions	Modified Following with adjustment to period end dates or as agreed by Participants and suitable to each Currency's market standards.
Periodic Settlement Payment/Resets	
Floating Legs 1 & 2	The payment amount of the Floating Leg is based on Notional, Payment Frequency, Day Count Convention, Floating Interest Rate Index, and Floating Reset Dates. Payments are settled in accordance with the payment frequency of the swap.