April 19, 2021

***Submitted via CFTC Portal***

Mr. Christopher J. Kirkpatrick Office of the Secretariat

Commodity Futures Trading Commission Three Lafayette Centre

1155 21st Street, N.W. Washington, D.C. 20581

Re: iSwap Euro B.V. – Rulebook Amendment

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), iSwap Euro B.V. (“iSwap”) hereby submits amendments to its Rulebook related to the above-captioned Rules.

The Rulebook has been amended to provide an update of certain requirements. For the avoidance of doubt, attached are the following:

* **Attachment A** is a complete and clean version of the iSwap Euro B.V. Terms and Conditions of Business, a new Agreement as defined in the Rulebook;
* **Attachment B** is a complete version of the amended Rulebook;
* **Attachment C** provides excerpted redlined pages from the Order Book Market Appendix, which includes nonsubstantive conformance updates;
* **Attachment D** provides a complete and clean version of the amended Order Book Market Appendix;
* **Attachment E** provides excerpted redlined pages from the Emergency Authority Policy, which includes nonsubstantive conformance updates;
* **Attachment F** is a complete and clean version of the Emergency Authority Policy.

The amendments will become effective on May 4, 2021, no fewer than ten business days from the date hereof. In connection with this submission, iSwap SEF hereby notifies the Commission that:

1. iSwap SEF certifies that it has posted a notice of this pending certification with the Commission and a copy of this submission on iSwap SEF’s website, including an updated version of the Rulebook, attached hereto as Attachment B;
2. iSwap SEF certifies that the Rules comply with the Act and the Commission’s regulations thereunder; and
3. No substantive opposing views with respect to the Rules were expressed to iSwap SEF by its governing board or committee members, members of iSwap SEF or market participants.

Should you have questions regarding this submission, please contact the undersigned at +44 20 7000 5184 or at kieron.nolan@icap.com.

Very truly yours,

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 Kieron Nolan, CEO, iSwap Euro B.V.

# ATTACHMENT A

Terms and Conditions of Business

**ATTACHMENT B**

Complete Rulebook

**ATTACHMENT C**

Excerpted Redline of Order Book Market Appendix

**[REDACTED]**

**ATTACHMENT D**

Updated Order Book Market Appendix

**[REDACTED]**

**ATTACHMENT E**

Excerpted Redline of Emergency Authority Policy

**ATTACHMENT F**

Updated Emergency Authority Policy