

Eurex Clearing AG
ECAG Rule Certification 039-24
June 7, 2024

1. The text of the proposed amendments to the Clearing Conditions (“Clearing Conditions”) of Eurex Clearing AG (“Eurex Clearing”) is appended as Attachment A. Any additions are underlined and any deletions are struck through.
2. The date of intended implementation is July 1, 2024.
3. Attached please find a certification that: (1) these amendments comply with the Commodity Exchange Act (the “Act”), and the Commission’s regulations thereunder; and (2) concurrent with the filing of this submission, Eurex Clearing is posting a copy of this filing to its website at: <https://www.eurex.com/ec-en/rules-regs/regulations/cftc-dco-filings>.
4. A concise explanation and analysis of the operation, purpose, and effect of the amended rule appears below.
5. There were no opposing views expressed regarding these amended rules.
6. Confidential treatment is not requested.

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

Eurex Clearing is proposing the below amendments.

A. Introduction of Automatic Intra-Day Margin Processing

The proposed amendments introduce an optional solution to give Clearing Members the option to provide excess margin in advance on collateral pool level, which is automatically processed by Eurex Clearing during multiple collateralization runs per day. Clearing Members can choose to either balance the selected collateral pool or to provide excess margin by a fixed amount or percentage. The reason for the amendments is to offer Clearing Members more flexibility and an automatic solution for intraday risk management. With an appropriate excess margin setup, the probability for intra-day margin calls can be reduced significantly, which caters to the demand for a schedule-based margin call approach while keeping the advantages of Eurex Clearing’s event-driven risk management approach.

B. Intra-Day Margin Call Communication Enhancement

The proposed amendments introduce a new intra-day report to share the documentation of an intra-day margin call provided via Common Report Engine (CRE). This change will leverage Eurex Clearing’s existing reporting landscape and increase the transparency towards clients.

Further information regarding the operation, purpose, and effect of the proposed amendments is discussed in Eurex Clearing Circular 039-24, which is appended as Attachment A.

Eurex Clearing has identified the following derivatives clearing organization (“DCO”) Core Principle as potentially being relevant to the above amendments:

1. DCO Core Principle D (Risk management): The proposed amendments will comply with DCO Core Principle D because the amendments provide for the introduction of automatic intra-day margin processing and enhancement of the intra-day margin call communication through introduction of a new intra-day report, and Eurex Clearing will continue to have margin requirements sufficient to cover potential exposures in compliance with this Core Principle.

CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT, 7
U.S.C. §7a-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.6, 17 C.F.R. §40.6

I hereby certify that:

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

/s/ Eric Seinsheimer

By: Eric Seinsheimer

Title: US CCO, Eurex Clearing AG

Dated: June 7, 2024