

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 24-282

Organization: The Board of Trade of the City of Chicago, Inc. ("CBOT")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date: 09/06/24 Filing Description: Initial Listing of the Options on Bloomberg Commodity Index Futures Contract

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- Certification § 40.6(a)
- Approval § 40.5(a)
- Notification § 40.6(d)
- Advance Notice of SIDCO Rule Change § 40.10(a)
- SIDCO Emergency Rule Change § 40.10(h)

Rule Numbers:

New Product

Please note only ONE product per Submission.

- Certification § 40.2(a)
- Certification Security Futures § 41.23(a)
- Certification Swap Class § 40.2(d)
- Approval § 40.3(a)
- Approval Security Futures § 41.23(b)
- Novel Derivative Product Notification § 40.12(a)
- Swap Submission § 39.5

Official Product Name: See filing.

Product Terms and Conditions (product related Rules and Rule Amendments)

- Certification § 40.6(a)
- Certification Made Available to Trade Determination § 40.6(a)
- Certification Security Futures § 41.24(a)
- Delisting (No Open Interest) § 40.6(a)
- Approval § 40.5(a)
- Approval Made Available to Trade Determination § 40.5(a)
- Approval Security Futures § 41.24(c)
- Approval Amendments to enumerated agricultural products § 40.4(a), § 40.5(a)
- "Non-Material Agricultural Rule Change" § 40.4(b)(5)
- Notification § 40.6(d)

Official Name(s) of Product(s) Affected:

Rule Numbers:

September 6, 2024

VIA ELECTRONIC 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: CFTC Regulation 40.2(a) Certification. Initial Listing of the Options on
 Bloomberg Commodity Index Futures Contract.
 CBOT Submission No. 24-282**

Dear Mr. Kirkpatrick:

The Board of Trade of the City of Chicago, Inc. (“CBOT” or “Exchange”) is certifying to the Commodity Futures Trading Commission (“CFTC” or “Commission”) the initial listing of the Options on Bloomberg Commodity Index Futures contract (the “Contract”) for trading on the CME Globex electronic trading platform (“CME Globex”) and for submission for clearing via CME ClearPort effective on Sunday, September 22, 2024 for trade date of Monday, September 23, 2024 as more specifically described below.

Contract Title	Options on Bloomberg Commodity Index Futures
CME Globex / CME ClearPort Code	AW / 70
Rulebook Chapter	CBOT 29B
Underlying Futures Contract / Commodity Codes	Bloomberg Commodity Index Futures / AW / 70
Contract Unit	1 Bloomberg Commodity Index Futures contract
Minimum Price Fluctuation	CME Globex: Premium > 5.00 index points trading in increments of 0.10 index points (\$10.00) Premium ≤ 5.00 index points trading in increments of 0.05 index points (\$5.00) CME ClearPort: 0.01 = \$1.00
Price Quotation	U.S. dollars and cents per index point
Trading and Clearing Hours	CME Globex PreOpen: Sunday 4:00 p.m. Central Time/CT – Monday 8:15 a.m. CT; Monday – Thursday 4:45 p.m. CT – Tuesday - Friday 8:15 a.m. CT CME Globex: Monday - Friday 8:15 a.m. - 1:30 p.m. CT daily with a maintenance period from 4:00 p.m. CT - 5:00 p.m. CT CME ClearPort: Sunday 5:00 p.m. - Friday 5:45 p.m. CT with no reporting Monday - Thursday from 5:45 p.m. - 6:00 p.m. CT
Listing Schedule	4 nearest quarterly months, and 1 additional December
Initial Listing	December 2024, March 2025, June 2025, September 2025, December 2025

Termination of Trading	Trading terminates at 1:30 p.m. CT on the 3rd Wednesday of the contract month.
CME Globex Matching Algorithm	F- FIFO
Minimum Block Level / Reporting Window	50 contracts – subject to a 5-minute reporting window
Strike Price Listing Schedule	When listed, strikes listed for 25% above and 25% below the at-the-money strike at 2 index point increment, and dynamic strikes at 0.25 index point increment. When less than 90 days remaining until expiration (DTE), strikes listed for 15% above and 15% below the at-the-money strike at 1 index point increment. When less than 60 days remaining until expiration (DTE), strikes listed for 10% above and 10% below the at-the-money strike at 0.5 index point increment. When less than 30 days remaining until expiration (DTE), strikes listed for 5% above and 5% below the at-the-money strike at 0.25 index point increment.
Exercise Style	European
Settlement Method	Exercise into Financial Futures

Appendix A provides CBOT Rulebook Chapter 29B. Appendix B (under separate cover) provides the Position Limit, Position Accountability and Reportable Level Table. Appendix C provides the CBOT Rule 588.H. (“Globex Non-Reviewable Trading Ranges”) Table. Appendix D provides the Exchange fees. Appendix E provides the Strike Price Listing and Exercise Procedure Table. Appendix F provides the Cash Market Overview and Deliverable Supply Analysis.

The Exchange reviewed the designated contract market core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“CEA” or “Act”) and identified that the Contract may have some bearing upon the following Core Principles:

Core Principle 2 – Compliance with Rules

Trading in the Contract shall be subject to CBOT Rulebook Chapter 4, which includes prohibitions against fraudulent, noncompetitive, unfair, and abusive practices. Additionally, trading in this Contract shall be subject to the Exchange’s trade practice rules, the majority of which are contained in Chapter 5 and Chapter 8 of the CBOT Rulebook. Trading activity in the Contract shall be subject to monitoring and surveillance by CME Group’s Market Regulation Department, which has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.

Core Principle 3 – Contracts Not Readily Subject to Manipulation

The Contract is not readily subject to manipulation due to the deep liquidity and robustness in the multiple underlying futures markets, which provides diverse participation and sufficient spot transactions. The underlying reference Index is judged to be sufficiently broad in definition and scope to deter attempted cornering, manipulation, crowding, or exertion of undue influence upon final settlements of expiring contracts.

Core Principle 4 – Prevention of Market Disruption

The Contract will subject to CBOT Rulebook Chapter 4, which includes prohibitions on manipulation, price distortion, and disruption to the expiration and assignment process. The Contract shall be subject to monitoring and surveillance by CME Group’s Market Regulation Department.

Core Principle 5 – Position Limits or Accountability

The Contract shall be subject to a Position Reporting Level of 200 contracts and to a Single Month and All Month Position Limit of 250,000 contracts. The speculative position limits for the Contract are consistent with the Commission's guidance.

Core Principle 7 – Availability of General Information

The Exchange shall disseminate a Special Executive Report (“SER”) that sets forth information in regard to specifications, terms, and conditions of the Contract. The SER will also be published on the Exchange's website.

Core Principle 8 – Daily Publication of Trading Information

The Exchange shall publish trading volumes, open interest levels, and price information daily of the Contract on the CME Group website and through quote vendors.

Core Principle 9 – Execution of Transactions

The Contract will be listed for trading on CME Globex and for clearing through CME ClearPort. The CME Globex electronic trading venue provides for competitive and open execution of transactions. CME Globex affords the benefits of reliability and global connectivity.

Core Principle 10 – Trade Information

All requisite trade information shall be included in the audit trail and will suffice for the Market Regulation Department to monitor for market abuse.

Core Principle 11 – Financial Integrity of Transactions

The Contract shall be cleared by CME Clearing, which is registered with the Commission as a derivative clearing organization, and which is subject to all CFTC regulations related thereto.

Core Principle 12 – Protection of Markets and Market Participants

Chapters 4 and 5 in the CBOT Rulebook set forth multiple strictures that preclude intermediaries from disadvantaging their customers. These Rules apply to trading in the Exchange's competitive trading venues and will apply to transactions in the Contract.

Core Principle 13 – Disciplinary Procedures

Chapter 4 of the CBOT Rulebook provides for the Exchange to discipline, suspend, or expel members or market participants who violate the rules of the Exchange. Trading in the Contract shall be subject to these provisions. The Exchange's Market Regulation Department has the authority to exercise its powers of enforcement, in the event that rule violations in the Contract are identified.

Core Principle 14 – Dispute Resolution

Disputes in respect of the Contract shall be subject to the arbitration provisions set forth in Chapter 6 of the CBOT Rulebook, which allow all nonmembers to submit to arbitration claims for financial loss resulting from transactions on the Exchange. Pursuant to these provisions, any member named as a respondent in any such claim submitted by a nonmember is required to participate in arbitration proceedings. Additionally, the Exchange requires members to resolve via arbitration all disputes concerning transactions on the Exchange.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.2(a), the Exchange hereby certifies that the Contract complies with the Act and rules thereunder. There were no substantive opposing views to this proposal.

The Exchange certifies that this submission has been concurrently posted on CME Group's website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (312) 466-7478 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Timothy Elliott
Managing Director and Chief Regulatory Counsel

Attachments: Appendix A CBOT Rulebook Chapter 29B - Options on Bloomberg Commodity Index Futures
Appendix B Position Limit, Position Accountability and Reportable Level Table in Chapter 5 of the CBOT Rulebook (attached under separate cover)
Appendix C CBOT Rule 588.H. – (“Globex Non-Reviewable Trading Ranges”) Table
Appendix D Exchange Fees
Appendix E Strike Price Listing and Exercise Procedure Table
Appendix F Cash Market Overview and Deliverable Supply Analysis

Appendix A
CBOT Rulebook
Chapter 29B

Options on Bloomberg Commodity IndexSM 1 Futures

29B00. SCOPE OF CHAPTER

This chapter is limited in application to options on Bloomberg Commodity IndexSM futures. In addition to this chapter, options on futures shall be subject to the general rules and regulations of the Exchange as applicable.

Unless otherwise specified, times referenced herein shall refer to and indicate Chicago time.

29B01. OPTIONS CHARACTERISTICS

29B01.A. Contract Months, Trading Hours, and Trading Halts

The number of contracts open for trading at a given time, and the hours of trading for options contracts shall be determined by the Exchange.

Options shall be listed for expiration on such dates and shall be scheduled for trading during such hours as may be determined by the Exchange.

29B01.B. Trading Unit

The trading unit shall be an option to buy, in the case of the call, or to sell, in the case of the put, one Bloomberg Commodity IndexSM futures contract (Chapter 29).

29B01.C. Minimum Fluctuations

Option prices shall be quoted in Index points. Each Index point shall represent \$100.00 per option contract.

The minimum price fluctuation shall be 0.10 Index points (equal to \$10.00 per option contract) for trades executed on CME Globex trading platform, *provided that* trade may occur at a price of 0.05 Index points (equal to \$5.00 per option contract), irrespective of whether such trade results in the liquidation of positions for both parties to such trade.

For transactions submitted for clearing via CME ClearPort, the minimum price fluctuation shall be 0.01 Index points (equal to \$1.00 per contract), regardless of the price level.

29B01.D. Underlying Futures Contract

For any European style Quarterly option, the Underlying Future Contract Shall be the Bloomberg Commodity IndexSM Futures for delivery in the same month as such option's named month of expiration.

29B01.E. Exercise Prices

Transactions and exercise of options shall be conducted for options contracts as set forth in the [Strike Price Listing and Exercise Procedures Table](#).

The Exchange may modify the provisions governing the establishment of exercise prices as it deems appropriate.

29B01.F. Position Limits, Exemptions, Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

¹ "Bloomberg®", "Bloomberg Commodity IndexSM" are service marks of Bloomberg Finance L.P. and its affiliates (collectively, "Bloomberg") and have been licensed for use for certain purposes by Board of Trade of the City of Chicago, Inc. Neither Bloomberg nor UBS Securities LLC and its affiliates (collectively, "UBS") are affiliated with Board of Trade of the City of Chicago, Inc., and Bloomberg and UBS do not approve, endorse, review, or recommend Bloomberg Commodity IndexSM futures. Neither Bloomberg nor UBS guarantees the timeliness, accurateness, or completeness of any data or information relating to Bloomberg Commodity IndexSM.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

29B01.G. Nature of Options

Upon exercise of a put option by the buyer of such option, the seller of such option shall incur the obligation to assume a long position in one Underlying Futures Contract (Rule 29B01.D.) at such option's exercise price (Rule 29B01.E.). Upon exercise of a call option by the buyer of such option, the seller of such option shall incur the obligation to assume a short position in one Underlying Futures Contract at such option's exercise price.

The buyer of a European-style Quarterly option (Rule 29B01.D.) may exercise such option only at its expiration.

29B01.H. [Reserved]

29B01.I. Termination of Trading

Trading in any Quarterly option shall terminate on the same date and at the same time as the termination of trading in such option's Underlying Futures Contract (Rule 29B01.D.).

If the market in the Underlying Futures Contract for such option does not open on the day scheduled for termination of option trading, trading in such option shall terminate on the next day on which the market in such Underlying Futures Contract is open for trading.

29B01.J. [Reserved]

29B02. EXERCISE AND ASSIGNMENT

In addition to the applicable procedures and requirements of Chapter 7, the following shall apply to the exercise of options.

29B02.A. Exercise

Any European Style Quarterly option (Rule 29B01.D.) may be exercised only at, and not before, expiration of such option.

Following termination of trading in expiring options, any such option that is in the money shall be automatically exercised by the Clearing House, and any such option that is out of the money shall be abandoned by the Clearing House. For the avoidance of doubt, no such option that expires in the money may be abandoned, and no such option that expires out of the money may be exercised.

Whether an option expires in the money or out of the money shall be determined by the Exchange, in its sole discretion, by reference to the Final Settlement Price of such option's Underlying Futures Contract (Rule 29B01.D.). An expiring call option shall be in the money if the corresponding futures Final Settlement Price is at or above such option's exercise price, and shall be out of the money if the corresponding futures Final Settlement Price is strictly below such option's exercise price.

A call option shall be in the money if the settlement price of such option's Underlying Futures Contract (Rule 29B01.D.) on the last day of trading in such option (Rule 29B01.I.) is strictly above such option's exercise price, and shall be out of the money if such settlement price is at or below such option's exercise price.

A put option shall be in the money if the settlement price of such option's Underlying Futures Contract on the last day of trading in such option is strictly below such option's exercise price, and shall be out of the money if such settlement price is at or above such option's exercise price.

29B02.B. Assignment

For a given option contract, an exercise notice accepted by the Clearing House in accordance with Rule 29B02.A. shall be assigned by the Clearing House through a process of random selection to clearing members carrying open short positions in such option contract. A clearing member to whom such exercise notice has been assigned shall be notified thereof as soon as practicable following such assignment.

The clearing member to whom such exercise notice has been assigned shall be assigned a short position in such option's Underlying Futures Contract (Rule 29B01.D.) if such option is a call, or a long position in such option's Underlying Futures Contract if such option is a put. The clearing member representing the option buyer making exercise shall be assigned a long position in such option's Underlying Futures Contract if such option is a call, or a short position in such option's Underlying Futures Contract if such option is a put.

All such futures positions shall be assigned at a price equal to the exercise price of such option contract, and

shall be marked to market (in accordance with Rule 814) on the Business Day on which the Clearing House accepts such exercise notice.

29B03. [RESERVED]

Appendix B

**CBOT Rulebook
Chapter 5
("Trading Qualifications and Practices")
Position Limit, Position Accountability, and Reportable Level Table**

(attached under separate cover)

Appendix C

**CBOT Rulebook
Chapter 5
("Trading Qualifications and Practices")
CBOT Rule 588.H. – ("Globex Non-Reviewable Trading Ranges") Table**

(additions underscored)

Instrument	Globex Symbol	Outrights			Spreads	
		Globex Non-Reviewable Ranges (NRR)	NRR: Globex Format	NRR: Minimum Ticks	NRR: Globex Format	NRR: Outright Minimum Ticks
<u>Options on Bloomberg Commodity Index Futures</u>	<u>AW</u>	<u>The greater of the following:</u> <ul style="list-style-type: none"><u>•Delta multiplied by the underlying futures non-reviewable range</u><u>•20% of premium up to 1/4 of the underlying futures non-reviewable range</u><u>•5 ticks</u>				

Appendix D
Exchange Fees

Level	Account Owner	Execution Type	Venue/Transaction Type	Executed with <6 months to expiration	Executed with 6-12 months to expiration	"Executed with 13+ months to expiration"		
1	Individual Members	Member Account Owner	CME Globex	\$0.20	\$0.40	\$0.80		
			EFP EFR Block	\$0.30	\$0.60	\$1.20		
	Individual Delegates	Delegate Trading Own Account	CME Globex	\$0.20	\$0.40	\$0.80		
			EFP EFR Block	\$0.30	\$0.60	\$1.20		
Equity Members (Individual Equity members, Clearing Equity Member Firms and Equity Member Firms)								
2	Rule 106.J Equity Member Firms	Member or Delegate	CME Globex	\$0.20	\$0.40	\$0.80		
			EFP EFR Block	\$0.30	\$0.60	\$1.20		
	Rule 106.I Affiliate Equity Member Firms Individual Equity Members (Other Member/Delegate executing trade) Clearing Equity Member Firms Rule 106.I Affiliate Membership Umbrella - Qualified Affiliate	Non-Member	CME Globex	\$0.20	\$0.40	\$0.80		
			EFP EFR Block	\$0.30	\$0.60	\$1.20		
			Rule 106.S. Family of Funds Equity Member Firms	Member, Delegate or Non-Member	CME Globex	\$0.20	\$0.40	\$0.80
					EFP EFR Block	\$0.30	\$0.60	\$1.20
Trading Members (Individual Non-Equity Members, Clearing Non-Equity Member Firms and Non-Equity Member Firms)								
3	Individual Non-Equity Members (Other Member/Delegate executing trade) Clearing Non-Equity Member Firms Rule 106.H. Member Firms Rule 106.I. Affiliate Trading Member Firms (w/ an owned seat)	Member, Delegate or Non-Member	CME Globex	\$0.32	\$0.64	\$1.28		
			EFP EFR Block	\$0.42	\$0.84	\$1.68		
	Individual Delegates (Other Member/Delegate executing trade) Rule 106.I. Affiliate Trading Member Firms (w/ a leased seat)	Member, Delegate or Non-Member	CME Globex	\$0.32	\$0.64	\$1.28		
			EFP EFR Block	\$0.42	\$0.84	\$1.68		
	Rule 106.S. Family of Funds Trading Member Firms	Member, Delegate or Non-Member	CME Globex	\$0.32	\$0.64	\$1.28		
			EFP EFR Block	\$0.42	\$0.84	\$1.68		
Electronic Corporate Member Firms								

Level	Account Owner	Execution Type	Venue/Transaction Type	Executed with <6 months to expiration	Executed with 6-12 months to expiration	"Executed with 13+ months to expiration"
4	Rule 106.R Electronic Corporate Member Firms (For other than CME Globex – See Non-Members)	Member, Delegate or Non-Member	CME Globex	\$0.32	\$0.64	\$1.28
			CME Globex - BTIC	\$0.42	\$0.84	\$1.68
Non-Members						
5	International Incentive Program (IIP) International Volume Incentive Program (IVIP) (For other than CME Globex – See Non-Members)	Member, Delegate or Non-Member	CME Globex	\$0.75	\$1.50	\$3.00
			CME Globex - BTIC	\$0.80	\$1.60	\$3.20
	Latin American Fund Manager Incentive Program (FMIP) (For other than CME Globex – See Non-Members)	Member, Delegate or Non-Member	CME Globex	\$0.75	\$1.50	\$3.00
			CME Globex - BTIC	\$0.80	\$1.60	\$3.20
	Non-Members	N/A	CME Globex	\$0.75	\$1.50	\$3.00
			EFP EFR Block	\$0.80	\$1.60	\$3.20

Processing Fees	Fee
Exchange Fees for Non-Trades (Member/Delegate/Non-Member)	\$0.10/\$0.25/\$0.55
Exchange Fees for Non-Trades - Expired Options	\$0.10
Position Adjustment/Position Transfer	\$0.10
Give-Up Surcharge	\$0.06
Facilitation Fee	\$0.40

Appendix E

Strike Price Listing and Exercise Procedures Table

Commodity Code	CME Globex Code	Product Name	Product Group	Product Subgroup	Exchange	Rulebook Chapter	Strike Price Listing Rule	Option Style	Contrary Instructions	Exact At-The-Money Characteristics	Underlying Commodity Code	Underlying Product Name
70	AW	Options on Bloomberg Commodity Index Futures	Agriculture	Commodity Indices	CBT	29B	When listed, strikes listed for 25% above and 25% below the at-the-money strike at 2 index point increment and dynamic strikes at 0.25 index point increment. When less than 90 days remaining until expiration (DTE), strikes listed for 15% above and 15% below the at-the-money strike at 1 index point increment. When less than 60 days remaining until expiration (DTE), strikes listed for 10% above and 10% below the at-the-money strike at 0.5 index point increment. When less than 30 days remaining until expiration (DTE), strikes listed for 5% above and 5% below the at-the-money strike at 0.25 index point increment.	European	No	Exercise Calls / Abandon Puts	AW	Bloomberg Commodity Index Futures

Appendix F

Cash Market Overview

The Bloomberg Commodity Index (“BCOM” or the “Index”) is designed to be a highly liquid and diversified benchmark for commodity investments. BCOM provides broad-based exposure to commodities and no single commodity or sector dominates the Index.²

BCOM uses both liquidity data and U.S.-dollar-weighted production data in determining the relative quantities of included commodities. BCOM purports to provide diversified exposure to commodities as an asset class. The explicit inclusion of liquidity as a weighting factor helps to ensure that BCOM can accommodate substantial investment flows.

BCOM primarily relies on liquidity data, or the relative amount of trading activity of a particular commodity, as an important indicator of the value placed on that commodity by financial and physical market participants. BCOM also relies on production data as a useful measure of the importance of a commodity to the world economy. Production data alone, however, may underestimate the economic significance of storable commodities (e.g., gold) at the expense of relatively non-storable commodities (e.g., live cattle). Production data alone may also underestimate the investment value that financial market participants place on certain commodities and/or the amount of commercial activity that is centered on various commodities. Accordingly, production statistics alone do not necessarily provide as accurate a reflection of economic importance as the pronouncements of the markets themselves. BCOM thus relies on data that is both endogenous to the futures markets (liquidity) and exogenous to the futures markets (production) in determining relative weightings.

The Index is composed of commodity futures contracts rather than physical commodities. Unlike equities, which typically entitle the holder to a continuing stake in a corporation, commodity futures contracts normally specify a certain date for delivery of the underlying physical commodity. As the exchange-traded futures contracts that compose the Index approach expiration, they are replaced by similar contracts that have a later expiration. Thus, for example, a futures contract purchased and held in August may specify an October expiration date. As time passes, the contract expiring in October may be replaced by a contract for delivery in December. This process is referred to as “rolling.”

BCOM and all related subindices are cash settled, and, to avoid the physical delivery of commodities from the underlying futures, the indices roll from current to subsequent contracts during the roll period defined in the methodology, which typically falls within the 6th-10th business day of each month.

BCOM Methodology Overview

The first step in constructing BCOM is to determine the relative liquidity and production percentages. The Commodity Liquidity Percentage (“CLP”) for each futures contract (a “Designated Contract”) selected as a reference contract for commodity designated for potential inclusion in the Index (collectively, “Commodities”) is determined by taking a five-year average of the product of trading volume and the historic U.S. dollar value of such futures contract and dividing the result by the sum of such products for all Designated Contracts. The Commodity Production Percentage (“CPP”) is also determined for each Commodity by taking a five-year average of production figures, adjusted by the historic U.S. dollar value of the applicable Designated Contract, and dividing the result by the sum of such products for all Commodities. The Commodity Liquidity Percentage and the Commodity Production Percentage are then combined (using a ratio of 2:1) to establish the Commodity Index Percentage (“CIP”) for each Commodity. On the fourth Business Day of the month of January (the “CIM Determination Date”) following the calculation of the CIPs, the CIPs are combined with the Settlement Prices

² Explanations of the methodology in this section are adapted and/or copied from BCOM Methodology February 2024 found here: https://assets.bbhub.io/professional/sites/10/BCOM-Methodology-FEB-2024_FINAL.pdf

of all Designated Contracts for such day to create the Commodity Index Multiplier (“CIM”) for each Designated Contract. The CIMs remain in effect throughout the ensuing year.

Once the CIMs are determined, the calculation of BCOM is an arithmetic process whereby the CIMs for the Index Commodities are multiplied by the respective prices in U.S. dollars for the applicable Designated Contracts. The products are then summed. The daily percentage change in this sum is then applied to the prior day’s BCOM value to calculate the then-current BCOM value.

Weighted average 1 (WAV1) and weighted average 2 (WAV2) are values used in the calculation of the Index. These values are calculated based on prices for the Lead Future and the Next Future, respectively. Exhibit 1 below lists the Designated Contract months that are to be used to determine the Lead Future and Next Future for each Index Commodity for this calculation. To illustrate, the Lead Future for Natural Gas in January is March, as is the Next Future, and in February the Lead Future is March and the Next Future is May. Thus, in February, WAV1 will incorporate the price for the March Natural Gas contract, and WAV2 will incorporate the price for the May contract. Note that as a new month begins, the Next Future becomes the Lead Future. Similarly, as a new month begins, the WAV2 from the prior month is redesignated as WAV1.

Exhibit 1: Bloomberg Commodity Index Contract Calendar

Commodity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	(F)	(G)	(H)	(J)	(K)	(M)	(N)	(Q)	(U)	(V)	(X)	(Z)
Natural Gas	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
WTI Crude Oil	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Brent Crude Oil	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan	Mar
RBOB Gasoline	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
ULS Diesel	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Live Cattle	Feb	Apr	Apr	Jun	Jun	Aug	Aug	Oct	Oct	Dec	Dec	Feb
Lean Hogs	Feb	Apr	Apr	Jun	Jun	Jul	Aug	Oct	Oct	Dec	Dec	Feb
Wheat (Chicago)	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar
Wheat (KC HRW)	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar
Corn	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar
Soybeans	Mar	Mar	May	May	Jul	Jul	Nov	Nov	Nov	Nov	Jan	Jan
Soybean Oil	Mar	Mar	May	May	Jul	Jul	Dec	Dec	Dec	Dec	Jan	Jan
Soybean Meal	Mar	Mar	May	May	Jul	Jul	Dec	Dec	Dec	Dec	Jan	Jan
Aluminum	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Copper	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar
Zinc	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Nickel	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Lead	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Tin	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Gold	Feb	Apr	Apr	Jun	Jun	Aug	Aug	Dec	Dec	Dec	Dec	Feb
Silver	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar
Platinum	Apr	Apr	Apr	Jul	Jul	Jul	Oct	Oct	Oct	Jan	Jan	Jan
Sugar No.11	Mar	Mar	May	May	Jul	Jul	Oct	Oct	Oct	Mar	Mar	Mar
Cotton No.2	Mar	Mar	May	May	Jul	Jul	Dec	Dec	Dec	Dec	Dec	Mar
Coffee "C"	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar
Cocoa	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar
Low Sulphur Gas Oil	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
FCOJ	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Nov	Nov	Jan	Jan
Feeder Cattle	Mar	Mar	May	May	Aug	Aug	Aug	Oct	Oct	Jan	Jan	Jan
Palladium	Mar	Mar	Jun	Jun	Jun	Sep	Sep	Sep	Dec	Dec	Dec	Mar
EU Allowances	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec
Murban Crude Oil	Apr	Apr	Jun	Jun	Aug	Aug	Oct	Oct	Dec	Dec	Feb	Feb

Once the applicable futures month is determined, the price for each Designated Contract used to calculate WAV1 and WAV2 for each Business Day is obtained and converted into U.S. dollars. Once Settlement Prices are obtained for the Lead Future and Next Future for each Index Commodity, the WAVs are calculated in respect of each Business Day as follows: WAV1 is calculated by multiplying each CIM by the Settlement Price for the respective Lead Future for that day and summing the results. WAV2 is calculated by multiplying each Commodity Index Multiplier by the Settlement Price for the respective Next Future for that day and summing the results. The WAVs are rounded to 8 decimal places.

The Commodity Index Multipliers are determined using the settlement price for each Designated Contract on the fourth business day of each year, weighted against the Multiplier from the previous year.

Exhibit 2: 2024 Underlying Contract CIMs

Commodity	2023 CIM	2024 FPD_S January 5th 2024	2023 CIM x FPD_S	2024 Weights	2024 ICIM	2024 CIM
Natural Gas	120.35028	2.621	315.4380947	7.98%	380.4345527	145.1486275
WTI Crude Oil	5.397478	73.86	398.6577266	7.36%	350.7893028	4.7493813
Brent Crude Oil	4.7307066	78.76	372.5904526	7.64%	363.9398433	4.62087155
Unleaded Gas	50.158343	2.1313	106.9024757	2.21%	105.1771111	49.34880639
ULS Diesel	36.939777	2.5759	95.15317276	2.16%	102.9409142	39.96308636
Low Sulphur Gas Oil	0.1668635	751.75	125.4395985	2.78%	132.4546063	0.17619502
Live Cattle	108.85168	1.70575	185.67376	3.47%	165.1065782	96.79412467
Lean Hogs	111.66453	0.7	78.1651675	1.78%	84.94975208	121.3567887
Wheat (Chicago)	19.322963	6.16	119.0294515	2.82%	134.2934135	21.80087881
Wheat (KC HRW)	10.842436	6.28	68.09049507	1.82%	86.66853272	13.80072177
Corn	43.348832	4.6075	199.7297418	5.66%	269.8030577	58.55736466
Soybeans	19.927659	12.5625	250.3412134	5.91%	281.4530952	22.40422648
Soybean Meal	0.3798987	369.4	140.3345761	3.54%	168.6851321	0.45664627
Soybean Oil	265.76288	0.4763	126.582862	3.35%	159.5830084	335.0472567
Aluminum	0.0918428	2265.25	208.04688	4.11%	195.6273751	0.08636017
Copper	68.749087	3.806	261.6590264	5.30%	252.4338529	66.32523724
Zinc	0.0493221	2565.75	126.5480754	2.49%	118.8626022	0.04632665
Lead	0.0218158	2078.5	45.34405716	0.87%	41.27036344	0.01985584
Nickel	0.0050968	16335.5	83.25926647	2.58%	123.1374891	0.00753803
Gold	0.4085004	2049.8	837.3440789	14.35%	683.6050818	0.33349843
Silver	9.8421429	23.315	229.4695619	4.48%	213.3264947	9.14975315
Sugar	693.19319	0.2111	146.3330826	2.81%	133.7799997	633.7280895
Cotton	93.558667	0.8019	75.02469544	1.57%	74.8233266	93.30755281
Coffee	92.835591	1.828	169.7034609	2.97%	141.7154468	77.52486149

The BCOM Settlement Price is calculated on each Business Day using the applicable Settlement Prices for WAV1 and WAV2 on the current Business Day and the prior Business Day. The suffix “_PS” designates the Settlement Price for the previous Business Day, and the suffix “_S” designates the Settlement Price for the current Business Day. “BCOM_S” indicates the value of BCOM on the current Business Day. The way BCOM is calculated on a given Business Day depends on which of three periods during the month in which this day falls: the period prior to the Roll Period, the Roll Period, or the period following the Roll Period. The “Roll Period” is used in this Methodology to refer to the sixth through tenth business days of every month.

Prior to the Roll Period

On Business Day 1 of the month, the Index is calculated as follows:

$$\text{BCOM_S} = \text{BCOM_PS} * \text{WAV1_S} / \text{WAV2_PS}^3$$

On Business Days 2 through 5 of the month, BCOM is calculated as follows:

$$\text{BCOM_S} = \text{BCOM_PS} * \text{WAV1_S} / \text{WAV1_PS}$$

³ On the first Business Day of the month, WAV1 is comprised of the same group of Designated Contracts that comprised the WAV2 of the prior month. Therefore, when calculating the change in the WAV1, it is divided by the WAV2 from the last Business Day of the prior month. This does not represent a “roll”, but rather a redesignation of the WAV2 to WAV1.

During the Roll Period

On each day of the Roll Period, the dependence of BCOM is shifted, at the rate of 20% per day, from WAV1 to WAV2 as follows:

Day 1 of Roll Period (Business Day 6 of Month):

$$\text{BCOM_S} = \text{BCOM_PS} * (\text{WAV1_S} * .80 + \text{WAV2_S} * .20) / (\text{WAV1_PS} * .80 + \text{WAV2_PS} * .20)$$

Day 2 of Roll Period (Business Day 7 of Month):

$$\text{BCOM_S} = \text{BCOM_PS} * (\text{WAV1_S} * .60 + \text{WAV2_S} * .40) / (\text{WAV1_PS} * .60 + \text{WAV2_PS} * .40)$$

Day 3 of Roll Period (Business Day 8 of Month):

$$\text{BCOM_S} = \text{BCOM_PS} * (\text{WAV1_S} * .40 + \text{WAV2_S} * .60) / (\text{WAV1_PS} * .40 + \text{WAV2_PS} * .60)$$

Day 4 of Roll Period (Business Day 9 of Month):

$$\text{BCOM_S} = \text{BCOM_PS} * (\text{WAV1_S} * .20 + \text{WAV2_S} * .80) / (\text{WAV1_PS} * .20 + \text{WAV2_PS} * .80)$$

Day 5 of Roll Period (Business Day 10 of Month):

$$\text{BCOM_S} = \text{BCOM_PS} * (\text{WAV2_S} / \text{WAV2_PS}) \quad (3)$$

After the Roll Period

For the remainder of the month, the calculation of BCOM will be:

$$\text{BCOM_S} = \text{BCOM_PS} * (\text{WAV2_S} / \text{WAV2_PS})$$

As the calculation above shows, during the roll period, the value of BCOM is gradually shifted from the utilization of WAV1 for Index calculation to the utilization of WAV2, at the rate of 20% per Business Day. Upon the 10th business day, the current Lead future officially rolls off. Exhibit 3 below represents an example of a roll calculation. Note, the change in WAV1 & WAV2 values are based on commodity price movements as their CIMs remain fixed for the entire year after the CIM determination date.

Exhibit 3: Roll Period Calculation Example

Unit Date	Business Day	WAV1	Roll Weight1	WAV2	Roll Weight2	BCOM
2-Jan-97	1	1196.764	1	1195.469	0	122.574
3-Jan-97	2	1196.121	1	1195.107	0	122.509
6-Jan-97	3	1214.668	1	1213.927	0	124.408
7-Jan-97	4	1214.314	1	1214.285	0	124.372
8-Jan-97	5	1220.453	1	1220.608	0	125.001
9-Jan-97	6	1218.382	0.8	1219.878	0.2	124.816
10-Jan-97	7	1216.373	0.6	1220.351	0.4	124.712
13-Jan-97	8	1207.51	0.4	1214.11	0.6	123.966
14-Jan-97	9	1209.179	0.2	1214.664	0.8	124.046
15-Jan-97	10	1226.924	0	1230.74	1	125.687
16-Jan-97	11	1212.804	0	1218.939	1	124.482
17-Jan-97	12	1206.098	0	1213.536	1	123.93
21-Jan-97	13	1194.815	0	1203.879	1	122.944
22-Jan-97	14	1197.584	0	1206.081	1	123.169
23-Jan-97	15	1197.393	0	1206.424	1	123.204

Continuing the Natural Gas example, the December 2022 BCOM Index Futures contract will be made up of January 2023 Natural Gas futures contracts, among others, as noted in Exhibit 1 above. These January 2023 Natural Gas contracts will roll to March 2023 contracts over the period of the 6th and 10th business days of December (this equates to the period from December 8, 2022 – December 14, 2022). After December 14, the underlying Natural Gas futures contract within the December 2022 BCOM Index Futures contract will reference the March 2023 as the Lead contract month.

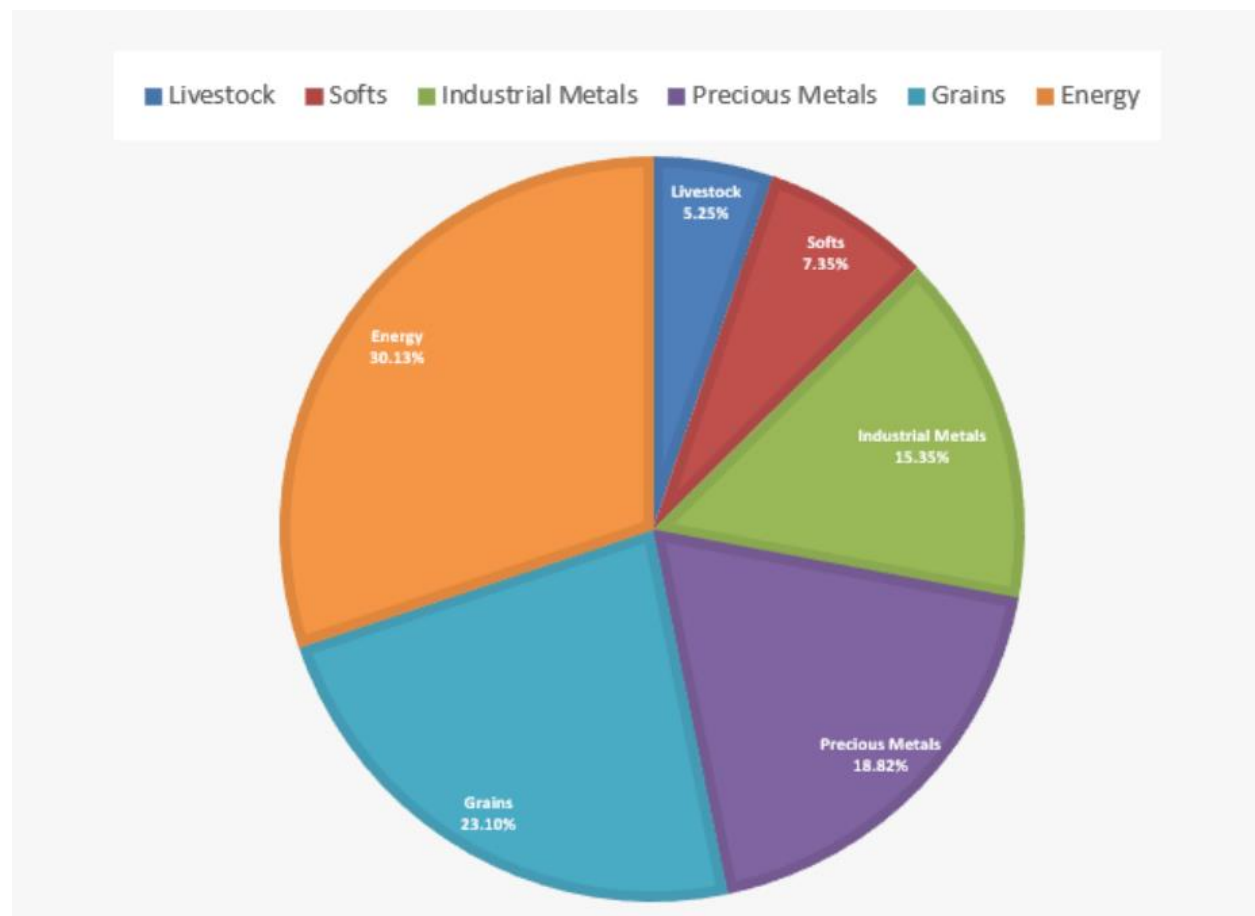
This example illustrates that the underlying futures contracts making up CME Group futures on the BCOM Index, including its related subindices, will roll to the next available contract month during the 6th-10th business days of each month. The way the Contract is designed, the roll period for the underlying futures will occur just before the overarching futures contract expires. To complete the example, the December 2022 BCOM Index Futures contract will expire on December 21, 2022, the 3rd Wednesday of the contract month. Thus, in conjunction with the roll period, the listing schedule and expiration of the Contract makes it so that there is zero possibility of the underlying contracts going spot.

Each of the Commodities eligible for inclusion in BCOM are assigned to “Commodity Groups.” The Commodity Groups, and the Commodities composing each Commodity Group, are as follows:

Commodity Group	Commodities
Energy	Crude Oil (WTI & Brent) Natural Gas RBOB Gasoline Low Sulphur Gas Oil ULS Diesel
Precious Metals	Gold Platinum Silver
Industrial Metals	Aluminum Copper

	Lead Nickel Tin Zinc
Livestock	Live Cattle Lean Hogs
Grains	Corn Soybeans Soybean Oil Soybean Meal Wheat (Chicago and KC HRW)
Softs	Cocoa Coffee Cotton Sugar

The 2024 target weights for BCOM are shown in the pie chart below.



The weights of each sector in BCOM may fluctuate according to market price fluctuations, however, upon each annual rebalancing, the weights are reset to the target weights.

BCOM is rebalanced annually, and it is during this rebalancing that the CIM are determined. At the start of each calendar year, new CIMs are calculated for each component future in the BCOM on the CIM Determination Date. The CIM Determination Date is always the 4th Business Day of each calendar year. After the CIMs are calculated, they remain fixed for the remainder of the year. The CIMs are a critical input to the calculation of the Index and help determine the target weightings for each component future in the Index. The component futures weightings may fluctuate from the target weighting illustrated in the pie chart above throughout the course of the year.

Constituents for the Index are included in Exhibit 4 & 5 below with data as of March 20, 2024 as well as December 20, 2023 respectively.⁴

Exhibit 4 – Bloomberg Commodity Index Constituents March 20, 2024

Exchange	Ticker	Constituent Futures Name	Expiration	Weight (%)
COMEX	GCM4	COMEX GOLD 100 TROY OUNCES	JUN 24	15
ICE EUROPE	CON4	ICE BRENT CRUDE OIL	JUL 24	8.07
NYMEX	CLK4	NYMEX LIGHT SWEET CRUDE OIL	MAY 24	7.95
CBOT	S K4	CBOT SOYBEAN	MAY 24	5.58
COMEX	HGK4	COMEX COPPER	MAY 24	5.54
NYMEX	NGK2	NYMEX HENRY HUB NATURAL GAS F	MAY 24	5.52
CBOT	C K4	CBOT CORN	MAY 24	5.3
COMEX	SIK4	COMEX SILVER	MAY 24	4.73
LME	LAK2	LME PRIMARY ALUMINUM	MAY 24	4.02
CME	LCM4	CME LIVE CATTLE	JUN 24	3.69
CBOT	BOK4	CBOT SOYBEAN OIL	MAY 24	3.38
CBOT	SMK4	CBOT SOYBEAN MEAL	MAY 24	3.22
ICE EUROPE	QSK4	ICE GAS OIL	MAY 24	2.97
ICE US	KCK4	NYBOT CSC C COFFEE	MAY 24	2.91
ICE US	SBK4	NYBOT CSC NUMBER 11 WORLD SUGAR	MAY 24	2.84
NYMEX	XBK4	NYMEX RBOB GASOLINE F	MAY 24	2.77
LME	LNK4	LME NICKEL	MAY 24	2.7
CME	LHM4	CME LEAN HOGS	JUN 24	2.52
CBOT	W K4	CBOT WHEAT	MAY 24	2.45
LME	LXK4	LME ZINC	MAY 24	2.38
NYMEX	HOK4	NYMEX NY HARBOR ULSD F	MAY 24	2.2
ICE US	CTK4	NYBOT CTN NUMBER 2 COTTON	MAY 24	1.77
CBOT	KWK4	KCBT HARD RED WINTER WHEAT	MAY 24	1.65
LME	LLK4	LME LEAD	MAY 24	0.84

⁴ Exhibit 4 & Exhibit 5 contains data from the Bloomberg Terminal

Exhibit 5 – Bloomberg Commodity Index Constituents December 20, 2023

Exchange	Ticker	Constituent Futures Name	Expiration	Weight (%)
COMEX	GCG4	COMEX GOLD 100 TROY OUNCES	FEB 24	17.47
NYMEX	CLH4	NYMEX LIGHT SWEET CRUDE OIL	MAR 24	8.39
ICE EUROPE	COH4	ICE BRENT CRUDE OIL	MAR 24	7.87
COMEX	HGH4	COMEX COPPER	MAR 24	5.61
NYMEX	NGH2	NYMEX HENRY HUB NATURAL GAS F	MAR 24	5.55
CBOT	S H4	CBOT SOYBEAN	MAR 24	5.48
COMEX	SIH4	COMEX SILVER	MAR 24	5.06
LME	LAH2	LME PRIMARY ALUMINUM	MAR 24	4.3
CBOT	C H4	CBOT CORN	MAR 24	4.25
CME	LCG4	CME LIVE CATTLE	FEB 24	3.87
ICE US	KCH4	NYBOT CSC C COFFEE	MAR 24	3.69
CBOT	SMH4	CBOT SOYBEAN MEAL	MAR 24	3.08
ICE US	SBH4	NYBOT CSC NUMBER 11 WORLD SUGAR	MAR 24	3.03
CBOT	BOH4	CBOT SOYBEAN OIL	MAR 24	2.82
ICE EUROPE	QSH4	ICE GAS OIL	MAR 24	2.72
LME	LXH4	LME ZINC	MAR 24	2.65
CBOT	W H4	CBOT WHEAT	MAR 24	2.46
NYMEX	XBH4	NYMEX RBOB GASOLINE F	MAR 24	2.33
NYMEX	HOH4	NYMEX NY HARBOR ULSD F	MAR 24	2.04
LME	LNH4	LME NICKEL	MAR 24	1.79
CME	LHG4	CME LEAN HOGS	FEB 24	1.64
ICE US	CTH4	NYBOT CTN NUMBER 2 COTTON	MAR 24	1.55
CBOT	KWH4	KCBT HARD RED WINTER WHEAT	MAR 24	1.42
LME	LLH4	LME LEAD	MAR 24	0.95

Analysis of Deliverable Supply

Bloomberg calculates and publishes official closing values for the Bloomberg Commodity Index based on the settlements of the index's component commodity futures contracts. CME Group's BCOM futures settle to the Bloomberg Commodity Index official closing value daily.

If Bloomberg does not provide a Bloomberg Commodity Index official closing value by 16:00 Central Time (CT), then the futures will settle to the most recent index value available.

Under normal market conditions, Bloomberg provides and distributes final settlements for all Bloomberg Commodity Index Futures with open interest. The final settlement price is based on a special quotation of the Bloomberg Commodity Index which corresponds to the expiring futures contract at the close of business on

the third Wednesday of the contract month, or, if the related Index is not published for that day, on the first preceding day on which the Index was published.⁵

The Bloomberg Commodity Index is calculated using the settlement prices of the index’s component futures on that day, except under the special conditions noted below:

- If an exchange that lists a component or components of the commodity index is not open on the final settlement day because of a scheduled closing, then the contribution to the final settlement price for the affected component or components shall be based on the settlement quotation of the first preceding trading day; or
- Market Disruption Event (“MDE”) shall mean: (a) the termination or suspension of, or material limitation or disruption in the trading of, any futures contract used in the calculation of the Bloomberg Commodity Index on that day, including if due to the closing of an exchange prior to the regularly scheduled closing time of an exchange; (b) the settlement price of any such contract reflects the maximum permitted price change from the previous day’s settlement price; or (c) the failure of an exchange to publish official Settlement Prices for any such contract. If an MDE occurs on the expiration date, the Bloomberg Commodity Index contract will settle based on a special value calculated using all component futures prices as of the expiration date that were not subject to an MDE and, for any futures contracts which were subject to an MDE, using the next available futures settlement price for which an MDE is no longer in effect, with a delay limited to 10 business days from the original expiration date. If on the 10th business day, an MDE is still in effect for the affected contracts, then UBS Securities LLC and CBOT will agree upon an appropriate estimated futures price or prices to be used to calculate the final adjusted settlement value of the Bloomberg Commodity Index.

To provide a snapshot of the underlying futures that would be used in the final settlement for the BCOM futures contract, price and volume data are provided in Exhibits 6-9 below for the past four expiration dates corresponding to the 3rd Wednesday of the past four quarterly contract months (March 20, 2024; Dec 20, 2023; Sep 20, 2023; June 21, 2023). The contract months shown relate to Bloomberg’s methodology on which contract months are eligible (please refer to Exhibit 1 for more detail).

Given that the final settlement price for the Index is calculated from the underlying futures contracts on the final settlement day (i.e., the 3rd Wednesday of the contract month), settlement prices for the underlying futures contracts comprising the Contract are provided below. Due to the rolling nature of the BCOM methodology transitioning from WAV1 to WAV2 prior to BCOM Futures final settlement, only “Next” futures contracts are included for the respective commodities. The volume data represents the individual commodity futures contracts volume during the respective settlement window on the final settlement day of the Index.

Exhibit 6: March 20, 2024 Final Settlement – Underlying Futures Settlement Prices & Volume

Contract Expiry	Underlying Futures Product	Commodity Code	Settle Price	Volume during Settlement Window	Settlement Window
2024-05	CHICAGO WHEAT	W	545	1,243	13:14:00 to 13:15:00 CT
2024-05	CORN	C	439	3,840	13:14:00 to 13:15:00 CT
2024-05	LIGHT SWEET CRUDE OIL	CL	81.27	2,415	14:28:00 to 14:30:00 ET
2024-06	GOLD	GC	2,182.4	163	13:29:00 to 13:30:00 ET

⁵ Adapted from CME Group’s Settlement Methodology - <https://www.cmegroup.com/confluence/display/EPICSANDBOX/Commodity+Index+Products>

2024-05	RBOB GASOLINE	RB	271.93	1,313	14:28:00 to 14:30:00 ET
2024-05	COPPER	HG	405.15	1,110	12:59:00 to 13:00:00 ET
2024-05	KC HRW WHEAT	KW	580.5	817	13:14:00 to 13:15:00 CT
2024-06	LEAN HOG	LN	100.63	883	12:59:30 to 13:00:00 CT
2024-06	LIVE CATTLE	48	184.78	506	12:59:30 to 13:00:00 CT
2024-05	NATURAL GAS	NG	1.85	2,884	14:28:00 to 14:30:00 ET
2024-05	NY HEATING OIL	HO	267.54	1,115	14:28:00 to 14:30:00 ET
2024-05	SILVER	SI	25.1	5,92	13:24:00 to 13:25:00 ET
2024-05	SOYBEAN	S	1,209.5	2,413	13:14:00 to 13:15:00 CT
2024-05	SOYBEAN MEAL	ZM	342.5	1,535	13:14:00 to 13:15:00 CT
2024-05	SOYBEAN OIL	ZL	49	1,611	13:14:00 to 13:15:00 CT
2024-05	SUGAR #11	SB	21.77	940	12:53:00 to 12:55:00 ET
2024-05	COFFEE	KC	182.4	46	12:23:00 to 12:25:00 ET
2024-05	COTTON NO 2	CT	92.18	589	14:14:00 to 14:15:00 ET
2024-07	BRENT CRUDE	CO	84.72	414	19:28:00 to 19:30:00 London Time
2024-05	LOW SU GASOIL	QS	818	886	16:28:00 to 16:30:00 London Time
2024-05	LME NICKEL	LN	17,409.07	-	13:00:00 to 13:04:59 London Time
2024-05	LME PRI ALUM	LA	2258.02	-	13:00:00 to 13:04:59 London Time
2024-05	LME ZINC	LX	2497.24	-	12:50:00 to 12:54:59 London Time
2024-05	LME LEAD	LL	2048.96		12:45:00 to 12:49:59 London Time

Exhibit 7 December 20, 2023 Final Settlement – Underlying Futures Settlement Prices and Volume⁶

Contract Expiry	Underlying Futures Product	Commodity Code	Settle Price	Volume during Settlement Window	Settlement Window
2024-03	CHICAGO WHEAT	W	610	1,093	13:14:00 to 13:15:00 CT
2024-03	CORN	C	469.75	5,875	13:14:00 to 13:15:00 CT
2024-03	LIGHT SWEET CRUDE OIL	CL	74.45	584	14:28:00 to 14:30:00 ET
2024-02	GOLD	GC	2,047.7	276	13:29:00 to 13:30:00 ET
2024-03	RBOB GASOLINE	RB	222.05	367	14:28:00 to 14:30:00 ET
2024-03	COPPER	HG	390.6	1,138	12:59:00 to 13:00:00 ET
2024-03	KC HRW WHEAT	KW	625	721	13:14:00 to 13:15:00 CT
2024-02	LEAN HOG	LN	70.22	849	12:59:30 to 13:00:00 CT
2024-02	LIVE CATTLE	48	170.3	588	12:59:30 to 13:00:00 CT
2024-03	NATURAL GAS	NG	2.21	1,070	14:28:00 to 14:30:00 ET
2024-03	NY HEATING OIL	HO	264.34	257	14:28:00 to 14:30:00 ET
2024-03	SILVER	SI	24.63	526	13:24:00 to 13:25:00 ET
2024-03	SOYBEAN	S	1,315.75	928	13:14:00 to 13:15:00 CT
2024-03	SOYBEAN MEAL	ZM	388.7	705	13:14:00 to 13:15:00 CT
2024-03	SOYBEAN OIL	ZL	50.76	1,008	13:14:00 to 13:15:00 CT
2024-03	SUGAR #11	SB	20.92	2,147	12:53:00 to 12:55:00 ET
2024-03	COFFEE	KC	190.6	504	12:23:00 to 12:25:00 ET
2024-03	COTTON NO 2	CT	79.21	215	14:14:00 to 14:15:00 ET
2024-03	BRENT CRUDE	CO	79.66	1,891	19:28:00 to 19:30:00 London Time
2024-03	LOW SU GASOIL	QS	779.25	458	16:28:00 to 16:30:00 London Time
2024-03	LME NICKEL	LN	16,854	101	13:00:00 to 13:04:59 London Time
2024-03	LME PRI ALUM	LA	2,241	986	13:00:00 to 13:04:59 London Time
2024-03	LME ZINC	LX	2,573	113	12:50:00 to 12:54:59 London Time

⁶Settle price & volume data from Bloomberg Terminal.

2024-03	LME LEAD	LL	2,082.5	21	12:45:00 to 12:49:59 London Time
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Exhibit 8: September 20, 2023 Final Settlement – Underlying Futures Settlement Prices and Volume

Contract Expiry	Underlying Futures Product	Commodity Code	Settle Price	Volume during Settlement Window	Settlement Window
2023-12	CHICAGO WHEAT	W	588.75	1,848	13:14:00 to 13:15:00 CT
2023-12	CORN	C	482.25	5,163	13:14:00 to 13:15:00 CT
2023-11	LIGHT SWEET CRUDE OIL	CL	89.66	5,078	14:28:00 to 14:30:00 ET
2023-12	GOLD	GC	1,967.1	12,25	13:29:00 to 13:30:00 ET
2023-11	RBOB GASOLINE	RB	257.07	1,396	14:28:00 to 14:30:00 ET
2023-12	COPPER	HG	377.6	612	12:59:00 to 13:00:00 ET
2023-12	KC HRW WHEAT	KW	729	920	13:14:00 to 13:15:00 CT
2023-12	LEAN HOG	LN	78.22	1,141	12:59:30 to 13:00:00 CT
2023-12	LIVE CATTLE	48	191.53	808	12:59:30 to 13:00:00 CT
2023-11	NATURAL GAS	NG	2.92	2,684	14:28:00 to 14:30:00 ET
2023-11	NY HEATING OIL	HO	324.56	1,102	14:28:00 to 14:30:00 ET
2023-12	SILVER	SI	23.84	783	13:24:00 to 13:25:00 ET
2023-11	SOYBEAN	S	1320	1,386	13:14:00 to 13:15:00 CT
2023-12	SOYBEAN MEAL	ZM	395.1	1,084	13:14:00 to 13:15:00 CT
2023-12	SOYBEAN OIL	ZL	59.29	1,852	13:14:00 to 13:15:00 CT
2024-03	SUGAR #11	SB	27.15	1,837	12:53:00 to 12:55:00 ET
2023-12	COFFEE	KC	158.2	478	12:23:00 to 12:25:00 ET
2023-12	COTTON NO 2	CT	86.86	974	14:14:00 to 14:15:00 ET
2024-01	BRENT CRUDE	CO	91.11	276	19:28:00 to 19:30:00 London Time
2023-11	LOW SU GASOIL	QS	934.75	910	16:28:00 to 16:30:00 London Time
2023-11	LME NICKEL	LN	19,500	-	13:00:00 to 13:04:59 London Time

2023-11	LME PRI ALUM	LA	2,242.5	-	13:00:00 to 13:04:59 London Time
2023-11	LME ZINC	LX	2,549.75	-	12:50:00 to 12:54:59 London Time
2023-11	LME LEAD	LL	2,211	-	12:45:00 to 12:49:59 London Time

Exhibit 9: June 21, 2023 Final Settlement – Underlying Futures Settlement Prices & Volume

Contract Expiry	Underlying Futures Product	Commodity Code	Settle Price	Volume during Settlement Window	Settlement Window
2023-09	CHICAGO WHEAT	W	872	1,329	13:14:00 to 13:15:00 CT
2023-09	CORN	C	623.5	1,105	13:14:00 to 13:15:00 CT
2023-09	LIGHT SWEET CRUDE OIL	CL	72.52	783	14:28:00 to 14:30:00 ET
2023-08	GOLD	GC	1,944.9	937	13:29:00 to 13:30:00 ET
2023-09	RBOB GASOLINE	RB	246.52	429	14:28:00 to 14:30:00 ET
2023-09	COPPER	HG	391.05	195	12:59:00 to 13:00:00 ET
2023-09	KC HRW WHEAT	KW	872	880	13:14:00 to 13:15:00 CT
2023-08	LEAN HOG	LN	92.77	868	12:59:30 to 13:00:00 CT
2023-08	LIVE CATTLE	48	169.75	717	12:59:30 to 13:00:00 CT
2023-09	NATURAL GAS	NG	2.66	1,280	14:28:00 to 14:30:00 ET
2023-09	NY HEATING OIL	HO	247.97	223	14:28:00 to 14:30:00 ET
2023-09	SILVER	SI	247.97	223	13:24:00 to 13:25:00 ET
2023-11	SOYBEAN	S	23.01	147	13:14:00 to 13:15:00 CT
2	SOYBEAN MEAL	ZM	1,377	1,913	13:14:00 to 13:15:00 CT
2023-12	SOYBEAN OIL	ZL	432.6	122	13:14:00 to 13:15:00 CT
0	SUGAR #11	SB	53.66	22	12:53:00 to 12:55:00 ET
2023-09	COFFEE	KC	25.85	1,968	12:23:00 to 12:25:00 ET
2023-12	COTTON NO 2	CT	172.25	373	14:14:00 to 14:15:00 ET
2023-09	BRENT CRUDE	CO	80.52	372	19:28:00 to 19:30:00 London Time
2023-09	LOW SU GASOIL	QS	77.14	1,559	16:28:00 to 16:30:00 London Time

2023-09	LME NICKEL	LN	717.5	191	13:00:00 to 13:04:59 London Time
2023-09	LME PRI ALUM	LA	21,248	-	13:00:00 to 13:04:59 London Time
2023-09	LME ZINC	LX	2,223.75	5	12:50:00 to 12:54:59 London Time
2023-09	LME LEAD	LL	2,416.74	-	12:45:00 to 12:49:59 London Time

Position Limit Model Analysis

CBOT staff finds that positions of 250,000 contracts of the BCOM Index futures could be held without exceeding any non-spot single month position limit for any of the component futures contracts. There is no spot month pricing from any component used in the index, so no spot month position limit is specified.

The position limit calculation methodology described below follows an approach suggested by CFTC staff and has been previously used to adjust position limit levels for S&P GSCI contracts in 2012 and 2013. The adjustments were certified with the CFTC via Chicago Mercantile Exchange Inc. Submission No. 13-036, dated February 8, 2013. The same methodology has also been used to determine positions limit levels for Dow Jones–UBS Roll Select Commodity Index Futures, launched in 2013, as well as Dow Jones-UBS Commodity Index Futures that were certified with the Commission via CBOT Submission No. 13-232, dated June 12, 2013, and CBOT Submission No. 13-494, dated October 10, 2013, respectively. CME Group Market Regulation Department staff raised no objections to the mentioned position limit proposals.

Most recently, CBOT increased the single/all month position limit for its Bloomberg Commodity Index Futures contract via CBOT Submission number [24-233](#) dated June 3, 2024.

This position limit calculation methodology draws from the BCOM [methodology](#), which utilizes each component’s Commodity Index Multiplier (“CIM”). These CIMs are updated on a yearly basis and are calculated based on the liquidity, production, and settlement prices of each component (see Section 2.7 of the methodology for an explanation). You can find the 2024 CIMs on Exhibit 2.

Also critical to this calculation is the WAV figure as it serves as the “normalizing constant” which can be thought of as a weighting factor for each commodity. During BCOM Futures final settlement, the index relies on WAV2 which will be the focus. However, both WAV1 and WAV2 influence BCOM index price level and are used in respect to the timing of the “roll” of the underlying constituents. The WAV2 figure is 4853.939; this figure is calculated by multiplying each CIM by the respective settlement price for the component future for that day (in this case, the prices for each component future on March 20, 2024) and summing the results (see section 2.8, page 32 of BCOM methodology). You will find this calculation in column O of the Excel in the Analysis tab. Dividing each constituent’s CIM by the WAV2 gives us the Hedge Ratio in column J. To find the Equivalent Position, we multiply the Hedge Ratio by an arbitrary index value then divide that product by the component’s contract unit, then multiply by the proposed position limit in cell I2 (250,000) and then finally multiply by the BCOM contract multiplier of 100.

The component futures equivalency is a positive function of the value of BCOM. In other words, when BCOM values increases, more futures contracts of the underlying components are needed to replicate a position in BCOM given that their prices remain static. Because of the nature of the CIM being constant while price fluctuates, the equivalent positions are negatively correlated to their respective contract settle price with higher prices resulting in lower equivalent contracts. The most recent settlement value (as of March 20, 2024) of BCOM was 99.2492. However, the 10-year high index level is 138.6677 set on April 29th, 2014. A conservative approach for this analysis involves using an index value of 150, greater than this 10-year high. Using an index value for the model that is 50% greater than the current value of 99.2492 observed on March 20, 2024 makes it highly unlikely that position limits for any component will be exceeded. This is because the analysis would look to match this higher index level with the current CIM’s and underlying prices that belong to an observed

index level of 99.2492 (on March 20th, 2024) which results in higher hypothetical equivalencies that serve as a buffer. Furthermore, the roll methodology used for BCOM that gradually shifts from WAV1 to WAV2 ensures a smoother transition to updated constituent futures contracts as underlying prices fluctuate alongside index level.

Once the component equivalent positions are calculated, they are then compared to each component's single month limit.⁷ All CME and CBOT products in the Index have single month position limits, in addition to Cotton, and these limits are used in comparison to the equivalent positions. For those products that either have single month accountability levels or no limits/levels (the remaining balance of products in the Index), a hypothetical limit is calculated using open interest of each contract. The hypothetical limit is calculated by finding the average annual open interest (OI) for each contract over the past two years and using the higher annual figure. In this case, the two time periods observed were January 3, 2022 – December 30, 2022 and January 3, 2023 – Dec. 29, 2023, and for each component, the higher annual average OI figure was used between the two time periods. Once this annual OI figure is calculated, if the figure is over 50,000, the hypothetical limit is calculated by summing 10% of 50,000 and 2.5% for the amount above 50,000. For example, COMEX Silver had an annual average OI figure of 165,718. The hypothetical limit for Silver is thus 7,893 (0.10 x 50,000 + 0.025 x (165,718-50,000)). For those contracts with an annual average OI less than 50,000, the hypothetical limit is simply calculated as 10% of the annual average OI figure. This OI figure used for the model is static regardless of index level and commodity price fluctuation.

The equivalent positions were calculated using the OI 10/2.5 approach for the following constituent futures: WTI Crude, Heating Oil, Natural Gas, RBOB Gasoline (NYMEX); Gold, Copper, Silver (COMEX); Brent Crude, Low Sulphur Gasoil (ICE U.S.); Lead, Nickel, Aluminum, Zinc (LME); Sugar, Coffee (ICE Europe). The NYMEX and COMEX equivalent positions were calculated using a *futures equivalent* open interest figure, whereas the equivalent positions for the ICE U.S., and ICE Europe products were calculated using a *futures-only* open interest figure.

The component equivalencies using 2024 BCOM weighting variables for 250,000 BCOM index futures contracts with a multiplier of \$100 when the index value is set at a 50% buffer value of 150 are as follows:

BCOM Index														Current Index level	3/20/2024				
	Contract Multiplier	100	As of	3/20/2024		BCOM Limit	250,000												
	Index Value	150																	
						WAV2	4853.939	(Price weighted CIM)											
Exchange	Symbol	Constituent	Month	Unit	Contract Unit	2024 CIM*	As of Price	Weight %	Hedge Ratio	Equivalent Position	Non-Spot Single Month Limit/Level	Difference	WAV2 Sum	Higher Annual Avg FE OI	Use as hypothetical Limit in Column L for products without Limits				
CBOT	C	CBOT Corn	MAY 24	cbu	5000	58.56736466	4.39	5.30%	0.01206388	9,048	57,800	48,752	257	Limit					
CBOT	S	CBOT Soybean	MAY 24	cbu	5000	22.40422648	12.095	5.58%	0.00481568	3,462	27,300	23,838	271	Limit					
CBOT	SM	CBOT Soybean Meal	MAY 24	s/ton	100	0.45864627	342.5	3.22%	0.00009408	3,528	16,900	13,372	156	Limit					
CBOT	BO	CBOT Soybean Oil	MAY 24	c/lb	60000	335.04725670	0.49	3.38%	0.06902584	4,314	17,400	13,086	164	Limit					
CBOT	W	CBOT Wheat	MAY 24	cbu	5000	21.80087881	5.45	2.45%	0.00449138	3,369	19,300	15,931	119	Limit					
CME	LH	CME Lean Hogs	JUN 24	c/lb	40000	121.35878870	1.0083	2.52%	0.02500171	2,344	6,000	3,656	122	Limit					
CME	LC	CME Live Cattle	JUN 24	c/lb	40000	86.79412487	1.8478	3.69%	0.01994135	1,870	6,300	4,430	179	Limit					
COMEX	HG	COMEX Copper	MAY 24	c/lb	25000	66.32623724	4.0915	5.54%	0.01986421	2,050	9,471	7,422	289	Accountability	228,857.87	9471			
COMEX	GC	COMEX Gold 100 Troy Oz	JUN 24	\$/oz	100	0.33349843	2162.4	15.00%	0.00006971	2,577	20,503	17,927	720	Accountability	670,132.27	20503			
COMEX	SI	COMEX Silver	MAY 24	\$/oz	5000	9.14975315	25.1	4.73%	0.00188502	1,414	7,893	6,479	230	Accountability	165,717.59	7893			
ICE Eur	CO	ICE Brent Crude Oil	JUL 24	\$/bbl	1000	4.82087155	84.72	8.07%	0.00095198	3,570	11,985	8,415	391	Neither	329,384.92	11985			
ICE Eur	OS	ICE Gas Oil	MAY 24	\$/ton	100	0.17819502	818	2.92%	0.00003630	1,361	6,750	4,389	144	Neither	80,016.79	5750			
CBOT	KW	BT Hard Red Winter WH	MAY 24	cbu	5000	13.80072177	5.805	1.65%	0.00284320	2,132	12,000	9,868	80	Limit					
LME	LL	LME Lead	MAY 24	\$/mton	25	0.01985584	2048.96	0.84%	0.00004009	614	897	284	41	Accountability	8,974.04	897			
LME	LN	LME Nickel	MAY 24	\$/mton	6	0.00753803	17409.07	2.70%	0.00001155	971	1,051	80	131	Accountability	10,507.85	1051			
LME	LA	LME Primary Aluminum	MAY 24	\$/mton	25	0.08636017	2258.02	4.02%	0.0001779	2,669	4,428	1,759	195	Accountability	44,279.71	4428			
LME	LX	LME Zinc	MAY 24	\$/mton	25	0.04632865	2497.24	2.38%	0.00008954	1,432	1,507	76	118	Accountability	15,073.72	1507			
ICE US	KC	NYBOT CSC C Coffee	MAY 24	c/lb	37500	77.52488149	1.824	2.91%	0.01597153	1,597	4,136	2,539	141	Accountability	41,360.02	4136			
ICE US	SB	CSC Number 11 Work	MAY 24	c/lb	112000	633.72808950	0.2177	2.84%	0.13055954	4,371	11,638	7,266	138	Accountability	315,515.44	11638			
ICE US	CT	NOT CTN Number 2 Cof	MAY 24	c/lb	50000	93.30755281	0.9218	1.77%	0.01922306	1,442	5,000	3,558	86	Limit					
NYMEX	NG	EX Henry Hub Natural C	MAY 24	\$/mmbtu	10000	145.14862750	1.85	3.52%	0.02903026	11,214	35,350	24,137	289	Accountability	1,264,009.25	35350			
NYMEX	CL	HEX Light Sweet Crude	MAY 24	\$/bbl	1000	4.74938130	81.27	7.95%	0.00097848	3,659	66,096	62,427	386	Accountability	2,493,848	66096			
NYMEX	HO	NYMEX NY Harbor ULSO	MAY 24	c/gal	42000	39.96308636	2.6754	2.20%	0.00823312	735	11,454	10,719	107	Accountability	308,179.87	11454			
NYMEX	XB	NYMEX RBOB F	MAY 24	c/gal	42000	48.34880639	2.7193	2.77%	0.01016675	908	12,026	11,117	134	Accountability	331,002.73	12025			

⁷ The following links contain references for the constituent futures position limits/accountability levels. CME Group position limit page: <https://www.cmegroup.com/market-regulation/position-limits.html>; LME accountability level memo: <https://www.lme.com/api/sitecore/MemberNoticesSearchApi/Download?id=1278bb3c-4a12-4afd-9065-7a494deabf47>; ICE U.S. Market Resource page: <https://www.theice.com/futures-us/market-resources>; ICE Europe Market Resource page: <https://www.theice.com/futures-europe/market-resources>.

The largest component equivalency is for Natural Gas futures (NG). The calculated single-month limit for that component is 35,350 contracts so the limit of 250,000 index futures contracts results in an equivalency of 11,214 that is under the calculated limit.