CX Futures Exchange, L.P 2018-10 40.6 Certification November 2, 2018

- 1. The text of the proposed amendments to the CX Futures Exchange, L.P. Compliance Manual is appended as Confidential Attachment A, which is submitted under a Petition for Confidential Treatment.
- 2. The date of intended implementation of the proposed amendments is ten business days following the filing of this submission.
- 3. Attached, please find a certification that: (1) these amendments comply with the Commodity Exchange Act, and the Commission's regulations thereunder; and (2) concurrent with this submission, CX Futures Exchange, L.P. ("CX") posted on its website: (i) a notice and copy of this submission.
- 4. A concise explanation and analysis of the operation, purpose, and effect of the amended rules appear below.
- 5. There were no opposing views expressed regarding these amended rules.
- 6. Confidential treatment is requested.

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

Pursuant to Commission Rule 40.6(a)(7)(vi), the following is a concise explanation and analysis of the operation, purpose, and effect of the amended policy.

CX is amending its Compliance Manual to address with greater particularity procedures to be used to address conflicts or potential conflicts arising in connection with the dual hatting of the Chief Compliance Officer. These amendments are in furtherance of, and in accordance with, the objectives of Core Principle 2.

CX is also amending its Compliance Manual to address with greater particularity the role that officers and staff outside of the Compliance Department may take in matters under the supervision and authority of the Compliance Department. These amendments are in furtherance of, and in accordance with, the objectives of Core Principles 2 and 13.

Finally, CX is amending the policy to reflect its recent change of name.

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 amended Compliance Manual complies with the Commodity Exchange Act, and the Commodity Futures Trading Commission's regulations thereunder; and
- (2) concurrent with this submission, CX Futures Exchange, L.P. posted on its website: (a) a notice of pending certification of the above with the Commission; and (b) a copy of this submission.

By: Nolan Glantz

Nolan Clark

Title: COO Date: 11/2/2018