



ICE Endex Position Transfer Policy

September 2025

Position Transfer Policy

This Position Transfer Policy (the “Policy”) outlines when position transfers are permitted, when approval from ICE Endex (“ICE Endex” or the “Exchange”) is required, and the process Members must follow to request such approval.

General

This Policy allows for the transfer of positions from one Member to another, or from one account to another account within the same Member, provided that the transfer is for the same customer. The circumstances under which a position transfer may or may not be accepted are described further in Section VI-3.5 of the Market Rules of ICE Endex (the “Market Rules”)¹.

To correct trades that have been erroneously cleared to an incorrect account or position account combination within five Business Days of the original trade date, Members should use the ‘Trades’ screen in the Front-End Clearing system (“FEC”). For trades older than five Business Days, Members may process them as a position transfer using the ‘Transfer’ screen in FEC, in accordance with the conditions specified in this Policy. Members should also consult the ICE Clear Europe clearing systems documentation for details on how to execute a position transfer.

Members must ensure that they manage positions promptly and with due care and diligence, whilst complying with Market Rules at all times. Failure to do so may result in the Member being subject to disciplinary action under the Market Rules.

Capitalized terms used in this Policy shall have the same meaning as attributed to them in the Market Rules unless defined otherwise in this Policy.

Change in Beneficial Ownership

Where a position transfer would result in a change in beneficial ownership, prior approval must be received from ICE Endex, Regulation and Compliance in accordance with Section VI-3.5(g) of the Market Rules. Members should complete the position transfer request form (see “Important Information” below) and email it to Compliance-Endex@ice.com.

As some of the transfers which involve a change in ownership may be complex in nature, the request for approval must be made at least one Business Day prior to the planned transfer date.

No Approval Required

Prior approval by ICE Endex is not required for a position transfer made using FEC, provided the transfer meets the following criteria:

- does one of the following:

¹ https://www.ice.com/publicdocs/endex/ICE_Endex_Markets_B.V._Rules.pdf

- a) transfers open positions from one Member to another Member made at the request of a client²; or
 - b) transfers open positions from one account to another account on the books of the same Member made at the request of a client where no change in ownership is involved³;
- and
- does not change the beneficial ownership of the positions involved. In accordance with Section 3.5-(g)(iv), a change in beneficial ownership shall not be deemed to have occurred with respect to:
 - a) transfers between firms which are 100% owned by the same Person; and
 - b) transfers between any Person and any entity owned 100% by such Person;
- and
- does not offset existing positions held in the spot month of a contract⁴.

Spot Month Definition

Generally, position transfers are acceptable, and approval will not be required, when the transfer is being made for the same beneficial owner of the position, provided that there is no resulting offset in a spot month contract. A spot month refers to the nearest month in which a futures or options contract is set to expire or be delivered.

Transfers in Other Months

Members should be mindful that position transfers which result in the offsetting of existing positions may have an impact on the market, through the reduction of open interest. The Exchange requires Members to request prior approval from the Exchange where the offsetting has [substantial] impact on any contract maturity's open interest. Such prior approval must be requested by Members from ICE Endex, Regulation and Compliance by completing the position transfer request form (see "Important Information" below) and emailing it to Compliance-Endex@ice.com.

Important Information

If approval is required, requests for position transfers must be made by using the attached form.

Please ensure the date of execution of the position being transferred is not the same as the transfer date.

The originating Member must ensure that the position to be transferred is open and available for transfer. The receiving Member must ensure compliance with this Policy and Section VI-3.5 of the Market Rules.

All position transfers input for processing may be subject to review and authorisation by ICE Clear Europe for risk monitoring purposes and may be rejected if it is determined that unacceptable margin requirements or risk would be generated.

² See Section VI-3.5(a)(i) Market Rules

³ See Section VI-3.5(a)(ii) Market Rules

⁴ See Section VI-3.5(c) Market Rules

When authorised, ICE Endex Market Supervision staff will inform the Member(s) and ICE Clear Europe that the transfer may be submitted into FEC. If there are conditions attached to the approval, this will also be notified to the Member(s).

No charge will be applied by the Exchange for position transfers.

ICE Endex Market Surveillance Committee monitors position transfers on a monthly basis. When reviewing position transfers or position transfer requests, the Exchange may seek further explanations or supporting documentation from Members in order to confirm the nature and legitimacy of the transfer, the events which gave rise to it and related actions by Member staff.

Exchange authorisation of a position transfer request will not preclude it from commencing disciplinary proceedings if it transpires that the request was not legitimate or that the position transfer may have been in contravention of applicable Market Rules or this Policy.

Any questions arising from this Policy should be addressed to ICE Endex, Regulation and Compliance department by email Compliance-Endex@ice.com.

For queries relating to the use of the ICE Clear Europe Clearing systems, Members are advised to contact ICE Clear Europe Operations (ICEClearEurope-ETDClearing@theice.com).

ICE ENDEX MARKETS

**REQUEST FOR TRANSFER OF POSITION PURSUANT TO SECTION VI
3.5**

1. Name of Member requesting a transfer

2. Nature of the Transfer

ICE Endex Rules, Section VI-3.5 (g) requires Exchange approval for certain transfers of positions where beneficial ownership between the transferring parties is not identical. Please indicate below, which if any of the following permissible transactions adequately describes the basis on which the transfer of positions is occurring:

____ Transfers made for the purpose of combining the Positions held by two or more funds which are operated by the same fund manager and traded by the same investment advisor, pursuant to the same strategy, into a single account so long as the transfers do not result in the liquidation of any open Positions, and the pro rata allocation of interests in the consolidating account does not result in more than a de minimis change in the value of the interest of any fund participant;

____ Other transfer (*please specify below*) as the Exchange, in its discretion, shall exempt in connection with, or as a result of a:

____ Merger

____ Asset purchase

____ Consolidation, or

____ Similar non-recurring corporate transaction between two or more entities where one or several entities become the successor in interest of one or several other entities.

____ Transfers made where the situation so requires, and such transfer is in the best interests of the Exchange or the Market.

____ Allocation error (please provide further detail in the text box below)

3. Explanation of Transfer(s):

Enclose a summary describing the nature of the transfer, including but not limited to the identities of the parties involved with the transfer, details about the merger, asset purchase, consolidation or other non-recurring event, fund managers involved, along with their general trading strategy, organizational charts, if applicable, and any other formal filings or documents relating to the event for which the transfer is being requested.

4. Contract Details

To be completed by the receiving member of the position transfer.

Please complete the excel spreadsheet template detailing the positions that are to be transferred that can be found here:

[ICE Endex Position Transfer Policy Request Specification](#)

All fields are mandatory.

5. Position(s) Transfer Price:

____ Futures Contracts and Futures-style Options Contracts:

____ The prior day's Settlement Price; or

____ The original market price.

____ Options Contracts

____ The original market Premium; or

____ The premium of zero.

6. Transfer Date:

For all such transfers, the receiving Member must hold the transferred positions on its books at either the original dates or the transfer date.

Original/Trade Date(s): _____

Transfer Date(s): _____

7. Clearing Firm(s):

Originating Member:

Clearing Firm: _____

Account Name: _____

Account Number(s): _____

Receiving Member

Clearing Firm: _____

Account Name: _____

Account Number(s): _____

I confirm that I am authorised to make this request on behalf of the aforementioned Member. I confirm that the information provided above is accurate and that this request is made in accordance with this Policy and Market Rules.

Name:
Date:
Job title:
Signature:
Contact number:

The undersigned certifies that it is their belief, after evaluation of all the appropriate information and materials, that the requested transfer would be permissible under the Market Rules, Section VI-3.5, and is seeking approval from the Exchange to permit such transfer. Please be advised that the further processing of this request is subject to ICEU's discretion. This form must be submitted to ICE Endex, Regulation and Compliance department at Compliance-Endex@ice.com .