

QC Clearing LLC, d/b/a Polymarket Clearing
7251 W. Palmetto Park Road
Suite 102
Boca Raton, Florida 33433

Via CFTC Portal

September 9, 2025

Mr. Christopher Kirkpatrick
Commodity Futures Trading Commission
1155 21st Street NW Three Lafayette Centre
Washington, DC 20581

Re: Polymarket Clearing 40.6(a) Rule Submission QCC.2025.8

I. Introduction

QC Clearing LLC, d/b/a Polymarket Clearing (“Polymarket Clearing” or the “DCO”), a derivatives clearing organization (“DCO”) registered with the Commodity Futures Trading Commission (“Commission” or “CFTC”), hereby submits this notice pursuant to Commission Regulation 40.6(a). This filing informs the Commission of proposed revisions to our Compliance Manual - Employee Code of Conduct.

The revised Compliance Manual - Employee Code of Conduct (“Manual”) is attached as Exhibit A, and will become effective on September 23, 2025. Terms used in this notice with initial capital letters but not defined herein retain the definitions assigned to them in the Polymarket Clearing Rulebook.

Pursuant to Commission Regulation 145.9, Polymarket Clearing is requesting confidential treatment for Exhibit A, as the Manual contains sensitive information related to internal processes, trade secrets, and commercial information which is not public.

II. Concise Explanation and Analysis of the Revisions, and their Compliance with Applicable Provisions of the Commodity Exchange Act (CEA), including the Core Principles and the Commission’s Regulations

The proposed revisions include non-substantive and minor modifications, such as accommodating the d/b/a change to Polymarket Clearing, removing all references to previous affiliates to reflect the current corporate structure, and correcting various typographical errors for improved clarity. Substantive changes have also been made to enhance the DCO's governance and compliance frameworks as outlined below.

The revisions strengthen the management of conflicts of interest in line with Polymarket Clearing Rule 3.1(h). Specifically, Chapter 7 has been updated to require members of the Board

of Directors to submit annual disclosure statements identifying any conflicts of interest. These changes ensure that potential conflicts are managed appropriately, consistent with the requirements of DCO Core Principle O (Governance Fitness Standards).

Additionally, as this Manual is jointly used by Polymarket Clearing and its affiliated DCM, Polymarket US, it contains certain revisions specific to the DCM's operations. Given these changes do not impact the DCO, they are not detailed in this notice

III. Certification

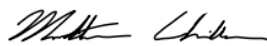
Polymarket Clearing hereby certifies to the CFTC, pursuant to the procedures set forth in Commission Regulation 40.6, that the attached submission complies with the CEA, as amended, and the regulations promulgated thereunder. Further, Polymarket Clearing is not aware of any substantive opposing views expressed regarding the Manual.

Polymarket Clearing hereby requests confidential treatment for Exhibit A pursuant to a concurrently filed request for confidential treatment. In accordance with CFTC Regulation 40.8, a redacted version of Exhibit A is included with this submission, while the complete, unredacted version has been submitted to the Commission separately under confidential cover.

Polymarket Clearing additionally certifies that, simultaneously with this filing, a copy of this submission was published on Polymarket Clearing's website, and is accessible at:
www.qcex.com

Please contact me using the information below if you have any questions regarding this notice..

Sincerely,



Matthew Childers
Chief Compliance Officer
Phone: (754) 300-9823
Email: matt.childers@qcex.com

Exhibit A
(Redacted)