

QCX LLC, d/b/a Polymarket US
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: QCX LLC 40.6(a) Rule Submission PMX.2025.8

I. Introduction

QCX LLC, d/b/a Polymarket US (“Polymarket US” or the “DCM”), a designated contract market (“DCM”) 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 PMUS Compliance Manual and Code of Conduct.

The revised PMUS Compliance Manual and Code of Conduct 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 US Rulebook.

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 to the Polymarket US PMUS Compliance Manual and Code of Conduct are primarily non-substantive and intended to provide minor clarifications. The changes include updating the DCM's assumed name from QCX to Polymarket US, removing references to affiliates under the previous corporate structure, and correcting various typographical errors for improved clarity and accuracy.

These administrative changes do not materially alter the operations, governance, or fee structure of the DCM. The revisions ensure the PMUS Compliance Manual and Code of Conduct remains accurate and transparent, thereby supporting compliance with the Commodity Exchange Act and the Commission’s Regulations, particularly Core Principle 7 regarding the availability of general information.

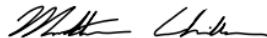
III. Certification

Polymarket US 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 US is not aware of any substantive opposing views expressed regarding the PMUS Compliance Manual and Code of Conduct.

Polymarket US additionally certifies that, simultaneously with this filing, a copy of this submission was published on Polymarket US'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,

A handwritten signature in black ink, appearing to read "Matt Childers", written in a cursive style.

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

**Exhibit A
(Redacted)**