



ICAP Global Derivatives Limited
2 Broadgate
London
United Kingdom
EC2M 7UR

April 1, 2021

Submitted via CFTC 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: ICAP Global Derivatives Limited – Regulation 40.6(a) Rule Certification – Notification of Amendments to Compliance Manual (IGDL-2021-R-4)

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the “Act”), and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission” or “CFTC”), ICAP Global Derivatives Limited (“IGDL”), a registered swap execution facility, hereby notifies the Commission that it is self-certifying amendments to its Compliance Manual, as described more fully in the Exhibits attached hereto. The intended date of implementation of the amendments is April 15, 2021.

Pursuant to Commission Regulation 40.6, this submission includes:

- (i) A concise explanation and analysis of the amendments to the Compliance Manual and their compliance with applicable provisions of the Act and the Commission regulations thereunder, attached as Confidential Exhibit A;
- (ii) A clean copy of the amended Compliance Manual, attached as Confidential Exhibit B; and
- (iii) A copy of the Compliance Manual marked to show changes to the currently effective version, attached as Confidential Exhibit C.

IGDL hereby certifies that the amendments comply with the requirements of the Act and Commission regulations thereunder.

Mr. Christopher J. Kirkpatrick
April 1, 2021
Page 2



IGDL is separately filing with the Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance, pursuant to Commission Regulation 145.9, a petition for confidential treatment of Confidential Exhibits A, B, and C (the “FOIA Confidential Treatment Request”) on the grounds that disclosure would reveal confidential commercial and financial information. A copy of the FOIA Confidential Treatment Request is included with this submission.

IGDL is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on IGDL’s website.

Please contact Brian D. Donnelly, Chief Compliance Officer, at (201) 984-6956 or by email at bddonnelly@tullettprebon.com with any questions regarding this matter.

Very truly yours,

ICAP Global Derivatives Limited


By: _____

Name: Brian D. Donnelly

Title: Chief Compliance Officer

Date: April 1, 2021

Enclosures

cc: CFTC Division of Market Oversight (dmosubmissions@cftc.gov)
Nancy Markowitz, CFTC (nmarkowitz@cftc.gov)

Mr. Christopher J. Kirkpatrick
April 1, 2021

Confidential Exhibit A

Explanation of Amended Compliance Manual

[FOIA Confidential Treatment Requested]

Mr. Christopher J. Kirkpatrick
April 1, 2021

Confidential Exhibit B

IGDL Compliance Manual

(Clean Version)

[FOIA Confidential Treatment Requested]

Mr. Christopher J. Kirkpatrick
April 1, 2021

Confidential Exhibit C

IGDL Compliance Manual

(Marked Version)

[FOIA Confidential Treatment Requested]