OG.COM
Markets

November 12, 2026

Via CFTC Portal

Mr. Christopher Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

RE: Submission Pursuant to Commission Regulation 40.6(a) – OG.com Markets Weekly Trading Streak Program

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act" or "CEA"), and Section 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission" or "CFTC") under the Act, the North American Derivatives Exchange, Inc., which operates the brand OG.com Markets (referred to herein as the "Exchange" or "OG.com Markets"), in its capacity as a designated contract market ("DCM"), hereby certifies to the Commission its Weekly Trading Streak Program (the "Program"), a retail incentive program designed to encourage eligible users to meet weekly trading thresholds and maintain consecutive-week participation. The Program is administered through the OG.com Markets platform and may be presented through OG.com Markets or an affiliate of the Exchange, as applicable; the Exchange nevertheless treats the Program as an Exchange incentive program subject to its oversight and to the Act and Commission regulations. The Program is offered through the OG.com App and OG.com Website. By way of background, OG.com Markets has traditionally offered retail promotions to retail Customers on a voluntary basis based on the Nadex Retail Terms and Conditions and Trading Member Terms of Business, however CFTC Staff has requested that OG.com Markets file promotions going forward, which is the basis for this filing. OG.com Markets permits FCMs to offer incentives to their customers provided that they

provide notice and represent to OG.com Markets that such incentives comply with the CEA, CFTC Regulations and NFA Rules, provided that they maintain appropriate records related to such promotions, provide any relevant information to OG.com Markets and agree to OG.com Markets instructing them terminate such programs based on applicable law or a request from the regulator.

Details of the Program are set forth in Exhibit A, and a discussion of the Program's impact on the Exchange's compliance with the DCM Core Principles is set forth in Exhibit B, both attached hereto.

The Exchange hereby certifies that the Program complies with the Act and the Commission Regulations adopted thereunder. No substantive opposing views were expressed to the Exchange with respect to the Program. The Exchange hereby certifies that a copy of this submission was posted on its website concurrently with this filing.

Should you have any questions regarding the above, please do not hesitate to contact me by e-mail at scott.kallback@nadex.com.

Sincerely,

/s/

Scott Kallback
Chief Compliance Officer/Chief Regulatory Officer

EXHIBIT A
OG.com Markets Weekly Trading Streak Program

Program Type and Objectives

The Program is a retail user incentive program. Its purpose is to encourage eligible OG.com Markets users to meet weekly trading thresholds and maintain consecutive-week participation through a disclosed reward ladder. The program requires two single trades of $10 or more each in contracts priced below $0.80, placed and settled before the week ends at Saturday 23:59 ET. The Program is designed and administered according to the objective, pre-disclosed parameters set out below and applies the same terms to all eligible users.

Program Scope; Contracts and Products Covered

The Program is offered through the OG.com Markets platform to eligible retail users that are non-eligible contract participants. The Program may be administered or presented by OG.com Markets or an affiliate of the Exchange, as applicable, but remains subject to Exchange oversight and is treated as an Exchange incentive program for purposes of this filing. The Program will not be offered on terms other than those set out below without a further rule submission. Program details are available on the OG.com App and OG.com Website.

The covered products are contracts available for trading on OG.com Markets that are priced below $0.80 at the time of execution, equivalently an implied probability below 80%. Program qualification is limited to contracts meeting that threshold. The Program's covered products, qualifying trades, and weekly measurement window will be disclosed before the applicable qualifying week begins.

Participant Obligations and Performance Requirements

To be eligible for a Program reward, a user must complete two single trades of $10 or more each in eligible contracts priced below $0.80, with both trades placed and settled before the week ends at Saturday 23:59 ET. Trades using other promotional boosts do not count toward the $10 minimum. Only bona fide settled single trades count, and the reward is credited when the second qualifying trade settles. The same Program terms will be offered to all eligible users.

The Exchange will determine eligibility using the criteria disclosed for the Program and will count only bona fide settled single trades. The Exchange will exclude wash trades, circular

trading, self-dealing, linked-account activity, artificial volume, and other transactions intended to create qualifying activity without bona fide market risk. The Exchange may disqualify a user, forfeit a reward, limit an account, withhold, reverse, or recover a reward, or take other action under the Exchange Rules for abuse or a failure to meet the disclosed criteria. Program communications will identify the qualifying trades, reward ladder, expiry, frequency limits, and other material terms before the qualifying week begins.

The Program is offered on a weekly basis. One reward is available per user per week, subject to a maximum reward of $25 per user per week. A missed week resets the streak to Week 1, and users may restart the Program unlimited times. Program terms will not be changed for users within a week already in progress. The Exchange will maintain sufficient information to identify the users targeted, the terms communicated, qualifying trades, rewards credited, and any exclusions or adjustments.

Program Parameters

Parameter	Program Term	Specific Program Value	Compliance / Communications
Program name and objective	OG.com Markets Weekly Trading Streak Program; encourage weekly bona fide trading and consecutive-week participation.	Weekly mission; reward ladder for Weeks 1–6.	Objective and terms posted before the qualifying week begins.
Eligible user segment	Retail users, subject to applicable rules and disclosed eligibility.	All eligible users meeting disclosed jurisdiction and account requirements. No undisclosed individualized terms.	Same terms offered to eligible users.
Program scope	OG.com App and Website	Weekly period ends Saturday at 23:59 ET; Program resumes on Sunday 00:00 ET	Terms disclosed before each qualifying week.

Qualifying trade	Two single trades of $10 or more each, placed and settled before Saturday 23:59 ET, in contracts priced below $0.80.	Other promotional boosts do not count toward $10; only bona fide settled single trades count; reward credited when the second trade settles.	Wash, circular, self-dealing, linked-account, and artificial-volume activity excluded; sanctions include disqualification, forfeiture, and account limitation.
Eligible contracts	Contracts priced below $0.80 (below 80% probability).	Reward may be used only on contracts below 80% probability.	No expansion beyond disclosed parameters.
Reward	Week 1: 50% profit boost up to $10; Week 2: 50% boost up to $20; Week 3: $10 bonus; Week 4: 25% boost up to $25; Week 5: 50% boost up to $25; Week 6: $10 bonus.	One reward per user per week; maximum $25 per user per week; missed week resets the streak to Week 1; unlimited restarts.	No undisclosed or "mystery" reward; any new reward tier posted in advance under a further rule submission if required.
Reward expiry	Rewards expire 7 days from disbursement at 23:59 UTC.	Expiry measured from disbursement; no extension except under disclosed terms.	Expiry disclosed before the qualifying week.
Communications	Terms posted on the OG.com App and OG.com Website.	Email, push notification, and in-app	Publicly posted on the OG.com App and OG.com Website;

		message before resumption and qualifying weeks as applicable	terms not changed within an active week.
Platform / affiliate	Program may be presented or administered through OG.com Markets or an affiliate.	Publicly posted on the OG.com App and OG.com Website.	Exchange oversight and Exchange Rules apply.

Incentive Structure and Compensation

Upon a user's completion of the two disclosed qualifying trades, the user will receive the reward for the applicable consecutive week when the second qualifying trade settles. The reward ladder is: Week 1, a 50% profit boost up to $10; Week 2, a 50% profit boost up to $20; Week 3, a $10 bonus; Week 4, a 25% profit boost up to $25; Week 5, a 50% profit boost up to $25; Week 6, a $10 bonus. A missed week resets the streak to Week 1, users may restart unlimited times, and one reward is available per user per week, subject to a maximum reward of $25 per user per week. The reward may be used only on contracts below 80% probability, one reward per order, and must be used in whole; it offsets the trade amount and fees, any excess is forfeited, and it may not be cashed out. Rewards expire 7 days from disbursement at 23:59 UTC. The reward will be provided as a bonus, except that New York users may receive a rebate where required or applicable. A New York rebate is paid after the position settles, equal to the lesser of the rebate value and the opening value of the outstanding position including fees; it is forfeited if the position is fully closed before settlement and expires 7 days from disbursement. No undisclosed or "mystery" reward will be offered. Any new reward tier will be posted in advance under a further rule submission if required. The qualifying trade, reward, expiry, and frequency terms will be disclosed before the applicable qualifying week begins. Performance in one week does not create eligibility for any future week or any other Exchange incentive program.

The Program parameters, including the eligible user segment, qualifying trades, covered contracts, reward ladder, reward expiry, maximum weekly reward, and weekly frequency, will be established before resumption and will not be varied for individual users within the same segment or for users within a week already in progress. Material changes will be certified where required. The Exchange will not credit a reward for excluded or artificial activity and may disqualify a user, forfeit, withhold, reverse, or recover a reward, limit an

account, or take other action under the disclosed terms and the Exchange Rules.

Program Terms (Effective Dates and Duration)

The Program began on September 6, 2026 and was paused effective September 30, 2026. During the pause, users who completed two qualifying trades that week received that week's reward, and users who completed one qualifying trade retained their streak. The Program will resume upon the certification of the Program and will be available as a standing framework until October 31, 2027, unless the Exchange modifies, suspends, extends, or terminates it, pursuant to CFTC Regulations including any rule certification that may be required. Existing streaks preserved at the pause will be honored on resumption. Users will be notified of resumption. The Program's launch, qualifying week, resumption, expiry, and end dates will be disclosed to eligible users before participation. Program terms will not be changed for users within a week already in progress.

Participant Eligibility

Eligible users are retail users who are registered and verified on OG.com, subject to the objective, pre-disclosed criteria described above and who are otherwise permitted to trade the applicable contracts under the Exchange Rules, applicable law, and the laws of their jurisdiction of residence. The Exchange will not limit eligibility through undisclosed individual negotiations. The Exchange will monitor Program activity and may disqualify a user, forfeit, withhold, reverse, or recover a reward, exclude activity, limit an account, suspend the Program, or take other action under the Exchange Rules if a user fails to meet the disclosed criteria or engages in prohibited conduct.

EXHIBIT B

DCM Core Principles

The Exchange has identified the following DCM Core Principles as being impacted by the Program:

Core Principle 2 (Compliance with Rules)

Core Principle 2 requires the DCM to have access requirements, including comparable fee structures, and the capacity to detect, investigate, and apply appropriate sanctions to persons that violate the contract market's rules. The Program uses objective, pre-disclosed criteria to identify eligible retail users and applies the same Program terms to all users within the applicable segment. The Exchange will not negotiate individualized reward terms outside the disclosed Program terms. The Exchange will monitor eligibility, qualifying trades, reward credits, and Program communications, and may disqualify a user, withhold, reverse, or recover rewards, limit an account, or suspend the Program where fraud, abuse, manipulative conduct, or a failure to meet the disclosed terms is suspected or identified. All Program activity remains subject to the Exchange Rules, including prohibitions on fraudulent, non-competitive, unfair, abusive, and manipulative conduct.

Core Principle 3 (Contracts Not Readily Subject to Manipulation)

The Program does not change any contract term, settlement source, or resolution methodology. Qualifying trades must be bona fide settled trades in eligible contracts priced under $0.80. The Exchange will monitor the Program to prevent rewards from becoming an incentive to influence settlement or engage in abusive trading. Qualification excludes wash trades, circular trading, self-dealing, linked-account activity, artificial volume, and other transactions intended to create qualifying activity without bona fide market risk. The Program's reward is capped at $25 per user per week, the boost caps are $10 in Week 1, $20 in Week 2, $25 in Week 4, and $25 in Week 5, and Weeks 3 and 6 provide $10 bonuses; the Program is limited to one reward per user per week and rewards may be applied only to contracts priced below $0.80, which limits any incentive to influence settlement of any contract.

Core Principle 4 (Prevention of Market Disruption)

The Exchange has compliance and regulatory staff that monitor trading, investigate

potential rule violations, and impose sanctions under the Exchange Rules. Automated trade surveillance and real-time monitoring will apply to activity associated with the Program, including potential wash trading, self-dealing, multiple-account abuse, collusion, artificial volume, and other conduct intended to obtain a reward without bona fide market risk. Chapter 9 of the Exchange Rulebook sets forth the Exchange's authority to investigate and sanction Members for manipulative or disruptive activity, and Exchange Rule 2.10 grants the Exchange jurisdiction over persons initiating or executing transactions on or subject to the Rules, directly or through an intermediary, and persons for whose benefit those transactions are initiated or executed.

Core Principle 7 (Availability of General Information)

To satisfy Core Principle 7, the Exchange will post this filing and make the Program's terms publicly available on the Exchange's website and OG.com Markets, without redacting the Program terms except for personal information or other information required by law to be withheld. The Program terms will be posted on the OG.com App and OG.com Website and will also be communicated to eligible users by email, push notification, and in-app message before the applicable qualifying week begins.

Core Principle 9 (Execution of Transactions)

Core Principle 9 requires the DCM to provide a competitive, open, and efficient market and mechanism for executing transactions that protects the price discovery process. The Program does not change the Exchange's matching, execution, settlement, or price discovery mechanisms. It provides rewards only after users complete disclosed qualifying trades, and the same terms apply to all users within the applicable segment. All trading remains subject to the Exchange Rulebook and the Exchange's requirements to establish, monitor, and enforce compliance with its Rules and the terms and conditions of contracts traded on the Exchange.

Core Principle 12 (Protection of Markets and Market Participants)

Core Principle 12 requires a DCM to protect markets and market participants from abusive practices committed by any party and to promote fair and equitable trading on the contract market. Chapter 5 of the Exchange Rulebook, including Rule 5.19, establishes rules protecting the market and market participants from abusive, disruptive, fraudulent, noncompetitive, and unfair conduct and trade practices. Those Rules apply to all users and transactions associated with the Program. The Exchange will apply the disclosed eligibility and reward criteria uniformly within each segment and will investigate and address reward abuse, multiple-account activity, collusion, wash trading, self-dealing, and

other prohibited conduct.

Core Principle 18 (Recordkeeping)

Core Principle 18, implemented by Commission Regulation 38.951, requires a DCM to maintain records of all activities relating to the business of the DCM in a form and manner acceptable to the Commission for at least 5 years. The Exchange will maintain records relating to the Program, including approved parameters, eligibility criteria, Program communications, eligible users, qualifying settled trades, rewards credited, expiries, exclusions, adjustments, launch and end dates, and oversight activity, in accordance with applicable Commission Regulations.

Core Principle 21 (Financial Resources)

Any cost of rewards, rebates, Program administration, or related Program activity will be funded from Company resources, including revenue from trading fees. The Exchange will not launch or continue the Program if doing so would impair compliance with Commission Regulation 38.1101 or any other applicable financial resource requirement.