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 Basketball Combo 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 Basketball Combo Program, marketed to users as the "Combo Run Campaign" (the "Program"), a retail incentive program for retail users who trade featured basketball combos. 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 Basketball Combo Program

Type and Objectives

The Program is an incentive program for retail users who trade featured basketball combos. Each week, a participating user receives a 25% boost that may be applied to a trade in a featured basketball combo; if the combo trade settles in the user's favor, the user receives an additional amount equal to 25% of the combo payout, capped at $25 per week. The Program terms will be disclosed in advance and will apply uniformly to users within the applicable segment.

Program Scope; Contracts and Products Covered

The Program is offered through the OG.com Markets platform to non-eligible contract participant users with an OG.com account. 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's qualifying trade, reward, expiry, frequency limit, and campaign period are set out in this filing, and the same disclosed terms will apply to all users within the applicable segment.

The covered products are basketball combo contracts available for trading on OG.com Markets that the Exchange designates as "featured" combos. Featured combos rotate throughout the week. The Program does not require coverage of every contract or every user. The applicable contract scope and campaign period will be disclosed before the Program begins.

Participant Obligations and Performance Requirements

To be eligible for a Program reward, a user must have an OG.com account, apply the weekly 25% boost to a featured basketball combo, and the combo must settle in the user's favor. If the featured basketball combo settles in the user's favor, the user will receive an additional amount equal to 25% of the combo payout, capped at $25 per week and credited automatically with the payout. For example, a featured combo that settles in user's favor with an $80 payout earns a $20 boost, for a total of $100. Each weekly boost is issued Monday at 12:00am ET, expires the following Sunday at 11:59pm ET, and is limited to one per user per week. The same Program terms will be offered to all users within the applicable segment.

The Exchange will determine eligibility using the criteria disclosed for the Program and will count only bona fide settled trades. The Exchange will exclude wash trades, self-dealing, linked-account activity, artificial volume, and other transactions intended to create qualifying activity without bona fide market risk. Program communications will identify the eligible users, the featured basketball combo requirement, the 25% boost and $25 weekly cap, the Monday 12:00am ET issuance and Sunday 11:59pm ET expiry, and the one-boost-per-week limit before the qualifying period begins.

The Program may be offered in weekly periods, subject to a limit of one boost per user per week. The Program may not be modified for an individual user within the applicable segment, except as required by law or disclosed in the Program terms. 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 Terms**	**Program-Specific Parameter**	**Compliance / Communications**
Program name and objective	OG.com Markets Basketball Combo Program (Combo Run Campaign) for retail users.	Program objective: encourage trading in featured basketball combos through a weekly 25% boost capped at $25	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 all users in the applicable segment

Program scope	OG.com Markets platform	Featured basketball combo trades in weekly periods	As disclosed to all eligible users
Qualifying combo trade	Trades settling in user's favor in a featured basketball combo	Program-specific qualifying combo trade terms	Only bona fide settled trades count
Eligible contracts	Featured basketball combos designated by the Exchange	Featured basketball combos only	No expansion beyond disclosed parameters
Reward	25% boost of the combo payout, capped at $25 per user per week, paid automatically with the payout	Program-specific reward terms; cannot be	Reward terms disclosed before the qualifying combo trade
Reward expiry	Each weekly boost is issued Monday at 12:00am ET and expires Sunday at 11:59pm ET.	Weekly (Monday 12:00am ET to Sunday 11:59pm ET); one boost per user per week	No extension except under disclosed terms
Communications	Terms posted or communicated to eligible users before the qualifying period begins.	Program-specific channels and timing	Publicly posted on the OG.com App and OG.com Website.
Platform / affiliate	Program may be presented or administered through OG.com Markets or an affiliate, as applicable.	Specified affiliate, if applicable	Exchange oversight and Exchange Rules apply.

Incentive Structure and Compensation

Upon a user's satisfaction of the disclosed Program criteria, the user will receive an additional amount equal to 25% of the payout on a featured basketball combo that settles in such user's favor, capped at $25 per week, subject to the weekly Monday 12:00am ET

issuance and Sunday 11:59pm ET expiry, the one-boost-per-week limit, and the other disclosed Program terms. The reward will be provided as a boost credited with the payout. The qualifying combo trade, reward, expiry, and frequency terms will be disclosed before the applicable qualifying period begins. Performance in one Program does not create eligibility for another Program. The boost may not be combined with any other boost, coupon, bonus, rebate, or promotional reward; if another reward has already been applied to a trade, the boost will not apply to that trade

The Program parameters, including the eligible users, the featured basketball combo requirement, the covered contracts, the 25% boost and $25 weekly cap, the weekly expiry, and the one-boost-per-week limit, will be established before launch and will not be varied for individual users within the same segment. The Exchange will not credit a reward for excluded or artificial activity and may withhold, reverse, or recover a reward under the disclosed terms and the Exchange Rules.

Program Terms (Effective Dates and Duration)

The Program start date is upon 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. Each weekly boost is issued Monday at 12:00am ET and expires Sunday at 11:59pm ET, and these terms will be disclosed to eligible users.

Participant Eligibility

Eligible users are retail users with an OG.com account, based on objective, pre-disclosed criteria, 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 withhold, reverse, or recover a reward, exclude activity, 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 users and applies the same Program terms to all users within the segment. The Exchange will not negotiate individualized reward terms outside the disclosed Program terms. The Exchange will monitor eligibility, qualifying combo trades, reward credits, and Program communications, and may withhold, reverse, or recover rewards 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 combo trades must be bona fide settled trades in featured basketball combos. 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, self-dealing, linked-account activity, artificial volume, and other transactions intended to create qualifying activity without bona fide market risk. The Program reward is a 25% boost of the combo payout capped at $25 per week, expires each Sunday at 23:59 ET, is limited to one boost per user per week, and is paid only if the combo settles in the user's favor. Because the reward depends on the outcome of the underlying basketball events, the Exchange will apply heightened surveillance to featured combos for indications of trading on material non-public information or attempts to influence event outcomes.

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 disclosed parameters and applicable 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 OG.com Markets and will also be communicated to eligible users before the qualifying period 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 combo 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, featured combos designated each week, boosts issued, applied, expired, and paid, Program communications, exclusions, adjustments, 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.