

November 13, 2025
BY ELECTRONIC FILING
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: BTNL 2025-36 - Self-Certification Pursuant to CFTC Regulation 40.2(a)
Certification - Listing of Sui US Dollar Hecto Futures Contract**

Dear Mr. Kirkpatrick,

Bitnomial Exchange, LLC (“BTNL” or the “Exchange”) hereby submits for self-certification to the Commodity Futures Trading Commission (“CFTC” or the “Commission”) under Commission regulation 40.2(a) its plan to list Sui US Dollar Hecto Futures (“SUUH”) contracts to be offered for trading on BTNL for an intended trade date on or after November 17, 2025.

Contract Description

The SUUH contract is a physically-settled, margined futures contract based on the price of 100 SUI (Sui). Attached Exchange Rule “Sui US Dollar Hecto Futures Contract” details the product specifications.

Sui (SUI) Market Overview

Sui is a decentralized smart contract platform designed to provide scalability and low-latency for decentralized applications (dApps). Utilizing a novel consensus mechanism and data model, Sui aims to offer high throughput and efficient resource management for developers and users.

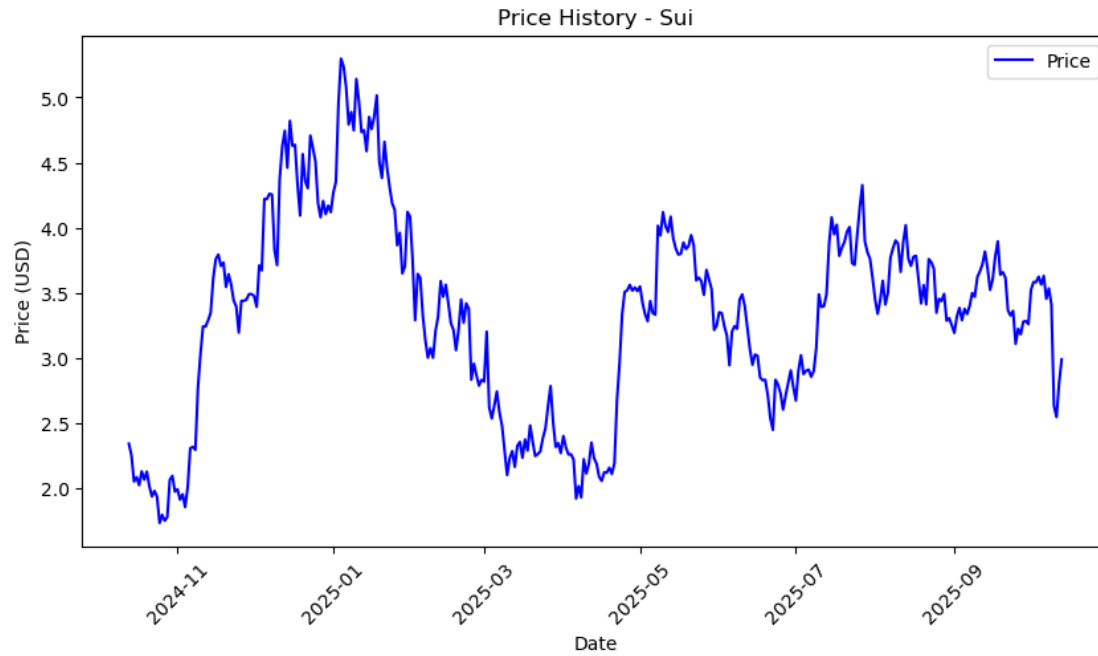
Governance: Sui plans to implement on-chain governance, enabling SU token holders to participate in decision-making processes regarding protocol upgrades and parameter adjustments.

Consensus Mechanism: Sui employs a unique consensus mechanism tailored for scalability and low-latency transactions, differentiating itself from traditional blockchain architectures.

Concentration of Ownership: The SU token distribution is designed to promote decentralization, with allocations for community incentives, developers, and early supporters.

Liquidity: Sui has a market capitalization of \$9,767,309,267.00 and a 30-day spot trading volume of \$1,302,673,374.00, ensuring strong liquidity and accessibility across centralized and decentralized exchanges as well as OTC dealers.

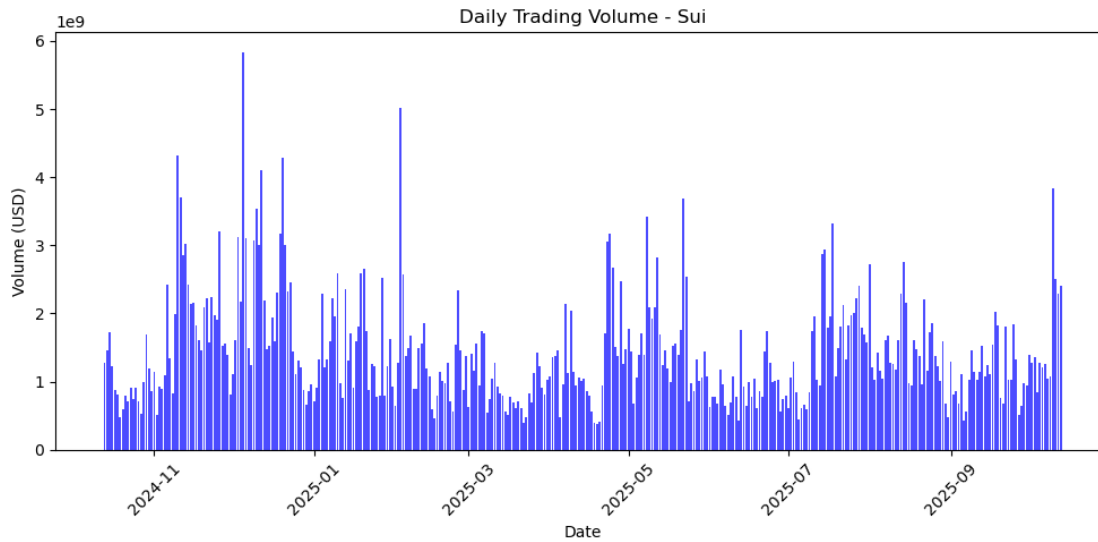
Price History



Price Chart

Source: <https://www.coingecko.com>

Volume History



Volume Chart

Source: <https://www.coingecko.com>

Deliverable Supply Analysis

- **Current Circulation:** 3,625,742,933 SUI
- **Total Supply:** 10,000,000,000 SUI

- **Max Supply:** 10,000,000,000 SUI
- **Market Cap:** \$9,767,309,267.00
- **30 Day Volume:** \$1,302,673,374.00

The Exchange proposes a contract month position limit of 40,000 futures contracts, representing 0.1% of total deliverable supply.

Core Principle Compliance

BTNL has determined that its rules related to the listing of SUUH contracts comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated by the Commission thereunder. BTNL has reviewed the DCM Core Principles and related guidance and determined that the listing of SUUH contracts impact the following Core Principles:

Core Principle 2 - Compliance with Rules:

Trading and delivery of SUUH contracts are subject to the Business Conduct and Trading Practice Rules found in Chapter 4 of the BTNL Rulebook including Rule 403 which forbids pre-arranged, pre-negotiated non-competitive trades. Trading and delivery in these products will also be subject to Market Operations and Discipline and Enforcement Rules found in Chapters 5 and 6, respectively.

Core Principle 3 - Contracts Not Readily Subject to Manipulation:

Multiple domestic and foreign markets trade the underlying SUI product, making manipulation unlikely. Additionally, Trading and delivery of SUUH contracts are not readily subject to manipulation because they are subject to position limits. Daily and Final settlement will be determined in accordance with BTNL Rule 509.

Core Principle 4 - Prevention of Market Disruption:

Trading and delivery of SUUH contracts are subject to prohibitions of market disruption under Chapters 4, 5, and 6 relating to Business Conduct and Trading Practices, Market Operations, and Discipline and Enforcement, respectively. All trading at BTNL Exchange is subject to market surveillance and a robust disciplinary framework.

Core Principle 5 - Position Limits or Accountability:

Trading and delivery of SUUH contracts are subject to position limits set forth in Chapter 15. The position limits are consistent with Commission guidance. Position limits may be adjusted based on market needs.

Core Principle 7 - Availability of General Information:

Prior to the launch of trading of SUUH contracts, product terms and conditions will be available on the BTNL website. Information on delivery of SUUH contracts will be made available on the BTNL website.

Core Principle 8 - Daily Publication of Trading Information:

The Exchange will publish SUUH trading volumes, open interest levels, and price information on its website and through quote vendors.

Core Principle 9 - Execution of Transactions:

Execution of all SUUH contracts will take place on the BTNL electronic trading platform. Electronic execution provides competitive and transparent transactions. All SUUH contracts will be cleared by Bitnomial Clearinghouse, LLC (“BNCH”), a CFTC-registered derivatives clearing organisation (“DCO”), subject to Commission rules and oversight.

Core Principle 10 - Trade Information:

All requisite trade information will be recorded and stored in the audit trail and will be surveilled and monitored in accordance with BTNL Rules.

Core Principle 11 - Financial Integrity of Transactions:

All SUUH contracts will be cleared by BNCH, a CFTC-registered DCO, subject to Commission rules and oversight.

Core Principle 12 - Protection of Markets and Market Participants:

BTNL Rules have set forth numerous requirements and protections to prevent intermediaries from disadvantaging customers.

Core Principle 13 - Disciplinary Procedures:

All SUUH contracts are subject to the protections provided by Chapter 6 of the BTNL Rulebook. Chapter 6 describes the disciplinary procedures of the Exchange that authorize the Exchange to discipline, suspend, or expel Participants that violate Exchange Rules.

Core Principle 14 - Dispute Resolution:

Disputes arising from trading of SUUH contracts must be arbitrated in accordance with BTNL Rules found in Chapter 7. All disputes, controversies or claims between or among themselves that relate to or arise out of any contract or otherwise arise out of one or more transactions made or to be made on the Exchange or subject to the Rules and are based upon facts and circumstances that occurred at a time when the parties were Participants or Customers.

Certification

The Exchange has spoken with Clearing Members and market participants who support the decision to launch Sui US Dollar Hecto Futures contracts. The Exchange is not aware of any substantive opposing views to the SUUH contracts. The Exchange certifies that the SUUH contracts and related rules certified herein comply with the Commodity Exchange Act and the rules and regulations promulgated thereunder.



The Exchange certifies that this submission has been concurrently posted on the Exchange's website at: <https://bitnomial.com/exchange/regulatory>.

If you have any questions or require further information, please contact the undersigned at james.walsh@bitnomial.com.

Sincerely, /s/

James A. Walsh
Chief Regulatory Officer
Bitnomial Exchange, LLC

Sui US Dollar Hecto Futures

Term	Value
Product Name	Sui US Dollar Hecto Futures
Product Code	SUUH
Contract Size	100 SUI (Sui)
Price Quotation	US Dollars per SUI
Tick Size	\$0.001 per SUI
Tick Value	\$0.10 per contract
Price Band Variation	\$0.026
Price Limit	\$1.3
Position Limit	40,000
Reportable Position Level	25 contracts
Market Hours	Rule 501
Contract Listing & Termination	Rule 502
Settlement Method	Deliverable - Rule 813 & Chapter 11
Settlement Price	Rule 509
Options Product Code	N/A
Options Exercise Style	N/A
Options Strike Price Listing Interval	N/A