

EXHIBIT A

1. The persons who control or direct the management and policies of ICE Clear Europe Limited ("**ICE Clear Europe**") consist of the following:
 - (a) its ultimate shareholder, IntercontinentalExchange, Inc.;
 - (b) its board of directors, as constituted under ICE Clear Europe's articles of association (annexed as Annex E); and
 - (c) its executives.
2. Please refer to Exhibit B for further information on ICE Clear Europe's board of directors and executives.

EXHIBIT B

1. The members of the ICE Clear Europe board of directors are as follows:
 - (a) Reid, Sir Robert (Chairman);
 - (b) Swann, Paul David (President and Managing Director since January 2012 and formerly President and Chief Operating Officer of ICE Clear Europe);
 - (c) Sprecher, Jeffrey (CEO, IntercontinentalExchange, Inc.);
 - (d) Hill, Scott (CFO Intercontinental Exchange, Inc.);
 - (e) Tanemura, Ronald (non-executive director, nominated by the CDS Risk Committee);
 - (f) Repard, James (non-executive director, nominated by and Chair of the CDS Risk Committee and member of the Audit Committee);
 - (g) Barton, Roger (non-executive director and Chair of the Futures and Options Risk Committee);
 - (h) Close, Robert (non-executive director, nominated by the FX Risk Committee and Chair of the FX Risk Committee);
 - (i) Nicholls, Peter (non-executive director and Chair of the Audit Committee);
 - (j) Lord Fraser of Carmyllie (non-executive director and member of the Audit Committee); and
 - (k) Hutcheson, Finbarr (non-executive director, nominated by LIFFE, subject to conclusion of administrative processes). Mr Hutcheson is the Co-Chief Executive of LIFFE responsible for the NYSE Euronext Group's European Fixed Income, Currencies and Commodities businesses. Mr Hutcheson joined NYSE Euronext in 2011 as head of global over-the-counter services at NYSE Euronext. He assumed his current role in July 2012. Prior to 2011 Mr Hutcheson worked as Global Head of Business Development Futures Services at Goldman Sachs International, London.

2. The details of the ICE Clear Europe management and executives are as follows:
 - (a) Swann, Paul David (President and Managing Director since January 2012 and formerly President and Chief Operating Officer of ICE Clear Europe);
 - (b) Wright, Claire Lesley (Head of Finance);
 - (c) Blake, Deirdre Ellen (Director – Regulation and Chief Compliance Officer heading regulatory, legal and compliance function);
 - (d) Weber, Michael Gerard (Chief Risk Officer, since 2011, and formerly a senior risk manager at JP Morgan);

- (e) Gibson, Michael (Chief Operating Officer heading technology function since January 2012, Deputy Chief Operating Officer heading technology function for ICE Clear Europe since January 2011 and provided consultancy services to ICE Clear Europe since October 2007);
- (f) Janmaat, Camiel Johannes Franciscus (Head of Treasury);
- (g) Lepar, Francois Alain Marie (Head of Operations);
- (h) Davis, Patrick Wolfe (Head of Legal and Company Secretary); and
- (i) Woodward, Mark (Director, Corporate Development).

EXHIBIT E

1. The amended articles of association of ICE Clear Europe are annexed as Annex E.
2. The rules and procedures of ICE Clear Europe currently in effect can be found at:
<https://www.theice.com/Rulebook.shtml?clearEuropeRulebook>
3. ICE Clear Europe has filed with the U.S. Securities and Exchange Commission (the "**SEC**" or the "**Commission**") proposed amendments to its rules and procedures to implement its clearing relationship with LIFFE (the "**LIFFE Clearing Proposed Amendments**") (File No. SR-ICEEU-2013-09). On May 13, 2013, ICE Clear Europe initially filed the LIFFE Clearing Proposed Amendments. On May 22, 2013, ICE Clear Europe submitted Amendment No. 1 to the proposed rule change. Notice of the proposed rule changes was published by the SEC on May 23, 2013 (Release No. 34-69628, published at 78 Fed. Reg. 32287 (May 29, 2013)). On June 4, 2013, ICE Clear Europe submitted Amendment No. 2 to the proposed rule change to set forth more fully the statutory basis for the proposed rule changes and to make certain additional rule changes relevant to changes in margin requirements. Notice of Amendment No. 2 was published by the SEC on June 5, 2013 (Release No. 34-69703). On June 20, 2013, ICE Clear Europe submitted Amendment No. 3 to the proposed rule change to make certain modifications to proposed Rule 207(f). Such filings and the amendments thereto are referred to herein as the "LIFFE Clearing Rule Notices."
4. Details of ICE Clear Europe's current fees can be found at:
https://www.theice.com/publicdocs/futures/ICE_Futures_Fees.pdf
https://www.theice.com/publicdocs/futures/IFEU_S2F_Energy_Fees.pdf

Fees in relation to the clearing of LIFFE products will be published by circular on ICE Clear Europe's website closer to the commencement of clearing of the LIFFE markets.

EXHIBIT F

1. IntercontinentalExchange, Inc. has previously disclosed information in relation to item 15 of the Form to the SEC in its Form 10-K filing dated February 6, 2013. The relevant extract from such filing is annexed as Annex F.

EXHIBIT G

1. ICE Clear Europe has entered into a clearing services agreement with LIFFE, dated December 20, 2012 (the "**LIFFE CSA**"), with respect to the clearing of the LIFFE market. The LIFFE CSA has been filed with the SEC and can be found at:

<http://www.sec.gov/Archives/edgar/data/1174746/000119312513040159/d448574dex1038.htm>

2. The LIFFE CSA was subject to non-material amendments on May 3, 2013.
3. ICE Clear Europe has previously provided information to the SEC in relation to item 12 of Form CA-1 (the "**Form**") to the SEC with respect to other markets it clears unrelated to the LIFFE markets.

EXHIBIT H

1. ICE Clear Europe's statutory accounts for the year ending December 31, 2012 can be found at:

https://www.theice.com/publicdocs/clear_europe/ICE_Clear_Europe_Limited_Statutory_Accounts_2012.pdf

EXHIBIT I

1. ICE Clear Europe's registered office and place of business is 5th Floor, Milton Gate, 60 Chiswell Street, London, EC1Y 4SA, United Kingdom. All clearing activities are conducted through this office.

EXHIBIT J

1. As has been previously disclosed to the SEC, ICE Clear Europe's current clearing activities include energy futures and option contracts traded on the ICE Futures US and ICE Futures Europe markets and credit default swap contracts. Such clearing activities are not proposed to be affected by this exemption application.
2. ICE Clear Europe proposes to become the clearing organization for futures and options contracts traded on the LIFFE market, and is seeking this exemption from clearing agency registration solely in connection with clearing LIFFE securities products. The LIFFE contracts that are proposed to be cleared by ICE Clear Europe include interest rate and government bond futures and options, certain agricultural futures and options, and futures and options on underlying equity securities and equity indices.
3. The proposed clearing arrangement for the LIFFE contracts is described in more detail in the LIFFE Clearing Rule Notices.
4. ICE Clear Europe's clearing activities with respect to the LIFFE securities products involving U.S. securities will be conducted outside the United States. ICE Clear Europe understands that currently no U.S. clearing member of LIFFE A&M holds a position in such products. Following the commencement of LIFFE clearing by ICE Clear Europe, under proposed new Rule 207(f) as discussed herein, only non-U.S. clearing members will be permitted to clear such products involving U.S. securities. ICE Clear Europe will implement additional operational controls to prohibit U.S. clearing members of LIFFE from clearing such products, as discussed in Exhibit R below. As it does not appear that any existing U.S. LIFFE clearing members are clearing these products, ICE Clear Europe does not believe that this restriction will in practice necessitate a material change in existing clearing arrangements for these products for market participants.
5. In addition, the internal ICE Clear Europe financial, managerial, operational and similar resources dedicated to the clearing function for LIFFE securities products are located in the United Kingdom or otherwise outside the United States. The ICE Clear Europe management team and risk management personnel are located in London. There will be a dedicated LIFFE Risk Manager supported by a team of risk analysts in place on, or after, 1 July 2013, and further resources within the Operations, Corporate Development, Finance and Treasury Departments all situated in London.
6. ICE Clear Europe itself does not have employees or offices located in the United States. ICE Clear Europe is recognized as an interbank payment system by the Bank of England under the Banking Act 2009 in the UK. Physical settlement of any LIFFE securities products will also occur through facilities outside the United States, in particular through the Euroclear UK and Ireland systems as well as other European Central Securities Depositories (CSDs). ICE Clear Europe does obtain certain information technology services from its U.S. affiliates pursuant to intercompany services agreements. However, all clearing personnel and decision-making, including supervision of such information technology services by ICE Clear Europe, remains in London, and those U.S. affiliates do not have any other role in ICE Clear Europe's clearing operations for the LIFFE securities products.

EXHIBIT L

1. ICE Clear Europe's existing rules and procedures applicable to the safeguarding of securities and funds will apply to the clearing of the LIFFE markets as set forth (and with the modifications described) in the LIFFE Clearing Rule Notices.

EXHIBIT N -1

1. A list of ICE Clear Europe's current clearing members can be found at:
https://www.theice.com/publicdocs/clear_europe/ICE_Clear_Europe_Clearing_Member_List.pdf
2. Pursuant to the proposed rule amendments described in the LIFFE Clearing Rule Notices, two new categories of clearing member, 'LIFFE Clearing Member' and 'F&O Clearing Member' are proposed to be created. A LIFFE Clearing Member is an ICE Clear Europe clearing member that is authorised by the Clearing House to become party to LIFFE Contracts and that is a clearing member of LIFFE. An F&O Clearing Member is an ICE Clear Europe clearing member who is authorised to become party to energy contracts and/or LIFFE contracts.

EXHIBIT O

1. ICE Clear Europe's current membership criteria are set out in Rule 201 of the ICE Clear Europe rules and in relevant sections of the ICE Clear Europe procedures.
2. In connection with the proposed LIFFE clearing activities, ICE Clear Europe has proposed to amend its Rules and procedures to establish criteria for LIFFE clearing membership, as set forth in the LIFFE Clearing Rule Notices.
3. Exhibit R sets out a further restriction in relation to the activity of LIFFE clearing members.
4. Please refer to Exhibit E for a link to the current rules and rules filed with the SEC.

EXHIBIT Q

1. Details of ICE Clear Europe's current fees can be found at:
https://www.theice.com/publicdocs/futures/ICE_Futures_Fees.pdf
https://www.theice.com/publicdocs/futures/IFEU_S2F_Energy_Fees.pdf
2. Fees in relation to the clearing of LIFFE products will be published by circular on ICE Clear Europe's website closer to the commencement of clearing of the LIFFE markets.
3. ICE Clear Europe does not mandate any prices, rates or fees for customer business undertaken by its clearing members.

EXHIBIT R

1. Please refer to Exhibit N and O for a list of current clearing members and references to the relevant membership criteria.
2. As described in the LIFFE Clearing Rule Notices, ICE Clear Europe's proposed Rule 207(f) provides that the following categories of clearing members will not be permitted to clear LIFFE contracts that are futures or options on underlying U.S. securities (other than futures contracts on broad-based security indices): FCM/BD clearing members and other clearing members that are organized in the United States of America or that have a U.S. residence, based upon the location of their executive office or principal place of business, including, without limitation, (i) a U.S. bank (as defined by Section 3(a)(6) of the Exchange Act) and (ii) a foreign branch of a U.S. bank or U.S. registered broker-dealer.
3. In addition to adopting this Rule, ICE Clear Europe will notify clearing members of these restrictions and is adopting procedures for monitoring and enforcing compliance by clearing members with these restrictions.
4. Specifically, in furtherance of this restriction, ICE Clear Europe, together with LIFFE, will implement operational controls to restrict the activities of U.S. clearing members. The clearing system to be used for the LIFFE securities products will have market access controls that prevent U.S. clearing members from creating or holding cleared positions in LIFFE securities products involving underlying U.S. securities. This is intended to prevent U.S. clearing members from engaging in any clearing-related activity (including give-ups or take-ups) in respect of those products.
5. LIFFE and ICE Clear Europe have agreed pursuant to service level arrangements between them under the LIFFE CSA that as part of the defined onboarding procedures when a new U.S. clearing member is approved for LIFFE clearing, they will both take the necessary steps in their respective systems to implement these access controls prior to granting the new member access to the clearing system.
6. ICE Clear Europe agrees to promptly notify the Commission of the relevant details of any incident involving noncompliance with, or violation of, proposed rule 207(f).
7. Please refer to Exhibit E for a link to the current ICE Clear Europe rules and the proposed ICE Clear Europe rules filed with the SEC.

EXHIBIT S

1. Please see the letter, dated June 11, 2013, from ICE Clear Europe to the SEC requesting an exemption from clearing agency registration in connection with the clearing of the LIFFE securities products, a copy of which is attached as Annex S hereto.
2. ICE Clear Europe requests that the Commission grant an exemption from clearing agency registration under Section 17A(b) of the Securities Exchange Act of 1934, as amended (the “**Exchange Act**”) and Commission Rule 17Ab2-1 thereunder solely in connection with ICE Clear Europe’s proposed clearing activity involving the LIFFE securities products, as set forth in the LIFFE Clearing Rule Notices. As discussed herein, ICE Clear Europe, as a registered securities clearing agency, has submitted to the Commission proposed rule changes to implement the LIFFE clearing relationship. In discussions surrounding those proposed rule changes, Commission staff has indicated a concern that ICE Clear Europe may not be permitted to clear the LIFFE securities products without a separate registration as a clearing agency under Section 17A(b) or an exemption from registration. Although ICE Clear Europe does not believe that registration should be required in connection with such activity in light of jurisdictional considerations and relevant precedent, ICE Clear Europe is prepared to seek this exemption (rather than proceed solely on the basis of the proposed rule changes) to provide certainty for itself, its clearing members and other market participants as to the legal status of such activities.
3. ICE Clear Europe believes that such an exemption would be consistent with the public interest, the protection of investors and the purposes of Section 17A of the Exchange Act, including the prompt and accurate clearance and settlement of securities transactions and the safeguarding of securities and funds. Significantly, ICE Clear Europe is not seeking an exemption from substantive regulation in connection with its clearing of the LIFFE securities products. As set forth in more detail in the LIFFE Clearing Rule Notice, ICE Clear Europe will clear the LIFFE securities products (as well as other LIFFE contracts) in a manner consistent with the requirements of Section 17A of the Exchange Act and Rule 17Ad-22 thereunder, including the requirements as to financial resources, operational and managerial resources, participant requirements, settlement procedures, safeguarding of funds and default procedures, among others.
4. Specifically, ICE Clear Europe proposes to clear the LIFFE contracts consistent with ICE Clear Europe’s existing clearing arrangements and related financial safeguards, protections and risk management procedures. Acceptance of LIFFE contracts for clearing, on the conditions set out in the LIFFE Clearing Proposed Amendments, will promote the prompt and accurate clearance and settlement of securities transactions, the safeguarding of securities and funds in the custody or control of ICE Clear Europe, and the protection of investors and the public interest, within the meaning of Section 17A(b)(3)(F) of the Exchange Act. The proposed amendments do not impact ICE Clear Europe’s financial resources devoted to its security-based swap related (i.e., credit default swap) clearing business. Clearing of LIFFE contracts will satisfy relevant requirements of Rule 17Ad-22, as discussed below.
 - (a) *Financial Resources.* As discussed in the LIFFE Clearing Rule Notices, ICE Clear Europe has structured the F&O guaranty fund to provide sufficient additional financial resources to support the clearing of LIFFE contracts consistent with the requirements of Rule 17Ad-22. Moreover, new policies were approved covering margin requirements, mark-to-market margin, capital to margin, membership, internal rating, backtesting, wrong-way risk, concentration charges, intraday margin and stress testing in respect of the LIFFE clearing relationship. Relevant models applicable to

the clearing of LIFFE contracts were subjected to independent validation as required by ICE Clear Europe's model governance framework.

- (b) Operational Resources. ICE Clear Europe will have the operational and managerial capacity to clear the LIFFE contracts as of the commencement of clearing, consistent with the requirements of Rule 17Ad-22(d)(4). Staffing levels and resources at ICE Clear Europe related to operational and technology needs for the clearing of LIFFE contracts will be subject to ongoing review. ICE Clear Europe believes that its existing systems are appropriately scalable to handle the expected increase in volume.
 - (c) Participant Requirements. ICE Clear Europe believes that the LIFFE Clearing Proposed Amendments and the clearing of LIFFE contracts are consistent with the requirements of Rule 17Ad-22(d)(2) to provide fair and open access through participation requirements that are objective and publicly disclosed. The amendments establish fair and objective criteria for the eligibility to clear LIFFE contracts. ICE Clear Europe clearing membership is available to participants that meet such criteria. ICE Clear Europe clearing members that wish to clear LIFFE contracts will have to satisfy the financial resources requirements to clear these products and continue to do so in order to preserve their eligibility to clear LIFFE contracts. Clearing member compliance with the requirements to clear LIFFE contracts will be monitored by ICE Clear Europe.
 - (d) Settlement. ICE Clear Europe believes that the LIFFE Clearing Proposed Amendments will improve the finality and accuracy of its daily settlement process and reduce the risk to ICE Clear Europe of settlement failures, consistent with the requirements of Rule 17Ad-22(d)(5), (12) and (15). The proposed amendments require ICE Clear Europe clearing members that clear LIFFE contracts to maintain accounts at approved financial institutions and that are denominated in the settlement currency of the LIFFE contracts such clearing member clears. Also, the amendments to the Finance Procedures clarify the steps a clearing member (and its approved financial institutions) must take in order for the clearing member's obligations to pay ICE Clear Europe to be deemed satisfied and complete. Likewise, the proposed amendments to the delivery procedures clarify the obligations of ICE Clear Europe and its clearing members in respect of physically-settled LIFFE contracts. The proposed amendments contemplate that ICE Clear Europe may, from time to time, enter into clearing services arrangements with LIFFE A&M, in respect of LIFFE contracts, pursuant to which certain functions may be performed by LIFFE A&M for ICE Clear Europe. In general, the terms to be added to the ICE Clear Europe delivery procedures in large part reflect the terms currently applicable to the LIFFE contracts under their existing clearing arrangements. These changes are thus in furtherance of, and are consistent with, the requirements of Rule 17Ad-22 and will facilitate the continued operation of the clearing house's settlement process. ICE Clear Europe believes that its rules and procedures related to settlements (including physical settlements), as amended, appropriately identify and manage the risks associated with settlements under LIFFE contracts.
 - (e) Default Procedures. ICE Clear Europe believes that the rules and its relevant procedures allow for it to take timely action to contain losses and liquidity pressures and to continue meeting its obligations in the event of clearing member insolvencies or defaults, including in respect of LIFFE contracts, in accordance with Rule 17Ad-22(d)(11).
5. ICE Clear Europe would thus manage its clearing activities involving the LIFFE contracts to the standards applicable to registered securities clearing agencies.

6. In addition, since ICE Clear Europe is a registered clearing agency for security-based swaps, ICE Clear Europe's clearing of the LIFFE securities products, even if technically exempt from registration, will nonetheless be subject to the requirements under the Exchange Act applicable to a registered clearing agency. Accordingly, ICE Clear Europe will continue to be subject to the jurisdiction of the Commission applicable to a registered securities clearing agency.
7. In particular, ICE Clear Europe will continue to be required to submit proposed amendments to its rules under Section 19(b) of the Exchange Act and to provide records upon request pursuant to Section 17(a) of the Exchange Act and Rule 17a-1 thereunder.
8. We also note that the Commission currently exercises (and would continue to exercise) supervision and examination over ICE Clear Europe's business generally, including regular on-site examination, and has (and would continue to have) access to the books and records of ICE Clear Europe.
9. As a result, ICE Clear Europe believes that granting an exemption that permits ICE Clear Europe to clear the LIFFE securities products in the manner set forth in the proposed LIFFE clearing rule amendments (as they may be amended consistent with Section 19(b) of the Exchange Act) will further the goals of Section 17A of the Exchange Act. Notably, the proposed clearing activities will bring the LIFFE securities products within a clearing agency that (even if exempt from registration for this purpose) is subject to supervision by the Commission and is required to comply with the standards of Section 17A of the Exchange Act and Commission regulations. Such clearing will therefore, in ICE Clear Europe's view, benefit the public interest and further the protection of investors and market participants.
10. ICE Clear Europe also notes that the planned transition of the LIFFE clearing relationship is important to the LIFFE market and market participants for purposes of compliance with European regulatory requirements. By September 2013, all European clearing organizations will need to apply for authorization under the European Markets and Infrastructure Directive (EMIR). The current LIFFE clearing arrangements are not built out for EMIR compliance, and the LIFFE market, and market participants, do not intend to develop independent clearing arrangements that will be EMIR compliant by that date. Instead, LIFFE A&M and market participants are relying for purposes of EMIR compliance on the clearing arrangement being transitioned to ICE Clear Europe, which intends to apply for authorization under EMIR. As a result, failure to transfer the clearing arrangement could result in significant disruption for the LIFFE market and market participants. ICE Clear Europe thus respectfully requests that the Commission consider this exemption request on an expedited basis.

ICE Clear Europe Limited

Form CA-1

Annexes

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1. Annex E Amended Articles of Association
2. Annex F Extract of Form 10-K filed on 6 February 2013
3. Annex S 11 June 2013 Exemption Request Letter