November 9, 2026

**SUBMITTED VIA CFTC PORTAL**
Secretary of the Commission
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: KalshiEX LLC – CFTC Regulation 40.2(d) Class Certification Regarding the Initial Listing of the "Will the <measure> of the Corrugated Recyclable Paper PPI <in/at> <time period> be <above/below/exactly/at least/at most/between> <value>?" Contracts

Dear Sir or Madam,

Pursuant to Section 5c(c) of the Commodity Exchange Act and Section 40.2(d) of the regulations of the Commodity Futures Trading Commission, KalshiEX LLC (Kalshi), a registered DCM, hereby notifies the Commission that it is self-certifying, as a class pursuant to Commission Regulation 40.2(d)(1), the "Will the <measure> of the Corrugated Recyclable Paper PPI <in/at> <time period> be <above/below/exactly/at least/at most/between> <value>?" contracts (each, a Contract, and together, the Class). The Contracts will initially be listed after close-of-business on November 9, 2026; they are listed as the day after because of limitations of the Commission's online submission portal. The Exchange intends to list the contracts on a recurring basis. The Contracts' terms and conditions (Appendix A) include the following strike conditions:

- **<measure>**
- **<in/at>**
- **<time period>**
- **<above/below/exactly/at least/at most/between>**
- **<value>**

Each Contract within the Class relies upon a pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations identical to those of the following product previously submitted to the Commission by Kalshi and certified pursuant to Commission Regulation 40.2(a) (the "Referenced Contract"): Official Product Name: "Will the average of the Corrugated Recyclable Paper PPI in Q1 2027 be <above/below/exactly/at least/at most/between> <value>?"; Official Receipt Date: November 9, 2026.

Along with this letter, Kalshi submits the following documents:

- A concise explanation and analysis of the Class;
- An analysis of the conditions of Commission Regulation 40.2(d)(1)(i)–(iv);
- Certification;
- Appendix A with the Contracts' Terms and Conditions;
- Confidential Appendices with further information; and
- A request for FOIA confidential treatment.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Xavier Sottile
Head of Markets
KalshiEX LLC
xsottile@kalshi.com

**KalshiEX LLC**
**Official Product Name: "Will the <measure> of the Corrugated Recyclable Paper PPI <in/at> <time period> be <above/below/exactly/at least/at most/between> <value>?"**
**Rulebook: CORRPAPERPPI**
**Summary: Corrugated recyclable paper PPI levels**
**Kalshi Contract Category: Economic/Demographic Measure -- U.S. Government**
**Kalshi Internal Category: Economics**
**November 9, 2026**

## CONCISE EXPLANATION AND ANALYSIS OF THE PRODUCT AND ITS COMPLIANCE WITH APPLICABLE PROVISIONS OF THE ACT, INCLUDING CORE PRINCIPLES AND THE COMMISSION'S REGULATIONS THEREUNDER

The following is a concise explanation and analysis of the Class and its compliance with the Act, including the relevant Core Principles (discussed in Appendix E), and the Commission's regulations thereunder. Although Commission Regulation 40.2(d)(1) requires certification only under Commission Regulations 40.2(a)(1), (a)(2), (a)(3)(i), (a)(3)(iv), and (a)(3)(vi), this explanation and analysis is provided voluntarily and consistent with CFTC Staff Advisory No. 26-22 (July 24, 2026) and CFTC Staff Letter No. 26-08 (Mar. 12, 2026).

### I. Introduction

**The "Will the <measure> of the Corrugated Recyclable Paper PPI <in/at> <time period> be <above/below/exactly/at least/at most/between> <value>?" Contracts are contracts relating to Economics.**

Each Contract within the Class is identical in all respects to the Referenced Contract, except for the <measure> (i.e., the specific statistic, specified by the Exchange, by which the initially published monthly values of the Corrugated Recyclable Paper PPI are combined or selected to produce a single value), the <in/at> (i.e., "in" or "at"), and the <time period> (i.e., date or range of time). The <above/below/exactly/at least/at most/between> and <value> strike conditions are present in the Referenced Contract and in every Contract within the Class. Every Contract within the Class relies on the identical pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations, as set forth in Appendix A and analyzed below.

Further information about the Contracts, including an analysis of their risk mitigation and price basing utility, as well as additional considerations related to the Contracts, is included in Confidential Appendices C, D, and E.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.2(d), the Exchange hereby certifies that each Contract within the Class complies with the Act and Commission regulations under the Act.

**General Contract Terms and Conditions:** The Contract operates similar to other event contracts that the Exchange lists for trading. The minimum price fluctuation is $0.01 (one cent). Price bands will apply so that Contracts may only be listed at values of at least $0.01 and at most $0.99. Further, the Contract is sized with a one-dollar notional value and has a minimum price fluctuation of $0.01 to enable Members to match the size of the contracts purchased to their economic risks. As outlined in Rule 5.16 of the Rulebook, trading shall be available at all times outside of any maintenance windows, which will be announced in advance by the Exchange. Members will be charged fees in accordance with Rule 3.13 of the Rulebook. Fees, if they are charged, are charged in such amounts as may be revised from time to time to be reflected on the Exchange's Website. A new Source Agency can be added via a Part 40 amendment. All instructions on how to access the Underlying are non-binding and are provided for convenience only and are not part of the binding Terms and Conditions of the Contract. They may be clarified at any time. Furthermore, the Contract's payout structure is characterized by the payment of an absolute amount to the holder of one side of the option and no payment to the counterparty. During the time that trading on the Contract is open, Members are able to adjust their positions and trade freely. The Expiration Value and Market Outcome are determined at or after Market Close. The market is then settled by the Exchange, and the long position holders and short position holders are paid according to the Market Outcome. In this case, "long position holders" refers to Members who purchased the "Yes" side of the Contract and "short position holders" refers to Members who purchased the "No" side of the Contract. If the Market Outcome is "Yes," meaning that an event occurs that is encompassed within the Payout Criterion, then the long position holders are paid an absolute amount proportional to the size of their position and the short position holders receive no payment. If the Market Outcome is "No," then the short position holders are paid an absolute amount proportional to the size of their position and the long position holders receive no payment. Specification of the circumstances that would trigger a Market Outcome of "Yes" are included below in the section titled "Payout Criterion" in Appendix A.

**CLASS CERTIFICATION CONDITIONS PURSUANT TO COMMISSION REGULATION 40.2(d)(1)**

Commission Regulation 40.2(d)(1) permits a designated contract market to list or facilitate trading in any swap or number of swaps based upon certain excluded commodities as a certified class, provided the DCM certifies, under Commission Regulations 40.2(a)(1), (a)(2), and (a)(3)(i), (iv), and (vi), that each of the conditions of Commission Regulation 40.2(d)(1)(i)–(iv) is satisfied. Each condition is satisfied with respect to the Class, as set forth below.

**Condition (i) – Excluded Commodity:** Each Contract within the Class is based upon an excluded commodity specified in Commission Regulation 40.2(d)(1). Specifically, each Contract is based upon an "occurrence, extent of an occurrence, or contingency" within the meaning of Section 1a(19)(iv) of the Act, namely, the level of a specified statistic of the initially published monthly values of the U.S. Bureau of Labor Statistics Producer Price Index for corrugated recyclable paper over a specified time period, which is beyond the control of the parties to the relevant contract, agreement, or transaction and is associated with a financial, commercial, or economic consequence.

**Condition (ii) – Identical Pricing Source, Formula, Procedure, and Methodology:** Each Contract within the Class is based upon an excluded commodity with an identical pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations. Each Contract within the Class relies upon the identical Source Agencies, in identical hierarchical order, as set forth in Appendix A: the U.S. Bureau of Labor Statistics of the U.S. Department of Labor (including the Producer Price Index news releases, PPI Detailed Report, and Producer Price Index database published by the U.S. Bureau of Labor Statistics at bls.gov), and the Federal Reserve Bank of St. Louis (including its Federal Reserve Economic Data (FRED) and Archival Federal Reserve Economic Data (ALFRED) databases at fred.stlouisfed.org and alfred.stlouisfed.org). This hierarchy is identical for every Contract within the Class.

Each Contract within the Class also relies upon an identical formula for calculating payment obligations: binary settlement of $1.00 if the Payout Criterion — that the <measure> of the initially published monthly values of the Corrugated Recyclable Paper PPI (BLS series WPU09120325, not seasonally adjusted, Index June 2006=100) for the calendar months <in/at> <time period> is <above/below/exactly/at least/at most/between> <value> — is satisfied, and $0.00 otherwise.

Each Contract within the Class further relies upon an identical procedure and methodology, namely the single, uniform set of rules set forth in the CORRPAPERPPI Rulebook attached as Appendix A. Every Contract in the Class settles on a single data series, BLS Producer Price Index commodity series WPU09120325 (Corrugated Recyclable Paper), and shares the same

definitions of Underlying, Source Agency, and Payout Criterion, the same rule that only each month's initial BLS publication is used, the same computation of each form of <measure>, and the same clarifications regarding scheduled revisions, corrections and material error, successor series, and unavailable data. Contracts within the Class differ only as to the <measure>, <in/at>, <time period>, <above/below/exactly/at least/at most/between>, and <value> specified by the Exchange for each Contract — each a strike parameter rather than a differing settlement source, procedure, or methodology. The Class does not include any other Producer Price Index series, any seasonally adjusted series, the corrugated recyclable paper index expressed on any base period other than June 2006=100, or any price index or price assessment for recovered paper published by any organization other than the U.S. Bureau of Labor Statistics, each of which would settle to a different data series. Consistent with CFTC Staff Advisory No. 26-22, the Class does not bundle permutations with differing settlement sources or methodologies; every Contract within the Class settles pursuant to the same rules irrespective of which <measure>, <in/at>, <time period>, <above/below/exactly/at least/at most/between>, or <value> is specified.

**Condition (iii) – Identity with a Previously Certified or Approved Product:** The pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations in each particular Contract within the Class is identical to the pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations in the Referenced Contract, a product previously submitted to the Commission by Kalshi and certified pursuant to Commission Regulation 40.2(a): Official Product Name "Will the average of the Corrugated Recyclable Paper PPI in Q1 2027 be <above/below/exactly/at least/at most/between> <value>?", Official Receipt Date November 9, 2026. Each Contract within the Class differs from the Referenced Contract only as to the specific <measure> (the statistic specified by the Exchange), the specific <in/at> ("in" or "at"), and the specific <time period> specified by the Exchange. The Referenced Contract's measure ("average"), "in," and time period ("Q1 2027") are themselves instances of these same class variables, and its <above/below/exactly/at least/at most/between> and <value> strike conditions are carried on terms identical to those of every Contract within the Class. No other term, condition, Source Agency, formula, procedure, or methodology differs between the Referenced Contract and any Contract within the Class.

**Condition (iv) – Identical Currency:** Each Contract within the Class is based upon an excluded commodity involving an identical currency: each Contract is denominated, trades, and settles exclusively in United States Dollars, with a Settlement Value of $1.00.

**Identification of Settlement Sources:** Consistent with CFTC Staff Advisory No. 26-22, the settlement sources upon which each Contract within the Class relies are specifically identified in Appendix A under "Source Agency," and the settlement methodology applicable to every Contract within the Class is set forth in Appendix A under "Payout Criterion."

**Commission Regulation 40.2(d)(2):** Kalshi acknowledges that the Commission may in its discretion require a registered entity to withdraw its certification under Commission Regulation 40.2(d)(1) and to submit each individual Contract, or certain individual Contracts, within the submission for Commission review pursuant to Commission Regulation 40.2 or 40.3.

**CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 7A-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.2, 17 C.F.R. § 40.2**

Based on the above analysis, and pursuant to Commission Regulations 40.2(d)(1) and 40.2(a)(1), (a)(2), (a)(3)(i), (a)(3)(iv), and (a)(3)(vi), the Exchange certifies that:

- ❏ Each Contract within the certified Class complies with the Act and Commission regulations thereunder.
- ❏ Each Contract within the certified Class satisfies each of the conditions of Commission Regulation 40.2(d)(1)(i)–(iv).
- ❏ This submission (other than those appendices for which confidential treatment has been requested) has been concurrently posted on the Exchange's website at https://kalshi.com/regulatory/filings.

Should you have any questions concerning the above, please contact the exchange at ProductFilings@kalshi.com.



By: Xavier Sottile
Title: Head of Markets
Date: November 9, 2026

**Attachments:**

Appendix A - Contract Terms and Conditions
Appendix B - Trading Prohibitions
Appendix C (Confidential) - Further Considerations
Appendix D (Confidential) - Source Agency
Appendix E (Confidential) - Compliance with Core Principles

# APPENDIX A – CONTRACT TERMS AND CONDITIONS

**Official Product Name: "Will the <measure> of the Corrugated Recyclable Paper PPI <in/at> <time period> be <above/below/exactly/at least/at most/between> <value>?"**
**Rulebook: CORRPAPERPPI**

# CORRPAPERPPI

**Scope:** These rules shall apply to each Contract within the Class.

**Underlying:** The Underlying for this Contract is the <measure> of the initially published monthly values of the Producer Price Index by Commodity for Pulp, Paper, and Allied Products: Corrugated Recyclable Paper (BLS series WPU09120325, not seasonally adjusted, Index June 2006=100) (the "Corrugated Recyclable Paper PPI"), as published by the U.S. Bureau of Labor Statistics, for the calendar months <in/at> <time period>. Revisions to the Underlying made after Expiration will not be accounted for in determining the Expiration Value.

**Instructions:** The Underlying can be found at: https://fred.stlouisfed.org/series/WPU09120325. These instructions on how to access the Underlying are provided for convenience only and are not part of the binding Terms and Conditions of the Contract. They may be clarified at any time.

**Source Agency:** The Source Agencies are, in hierarchical order, the U.S. Bureau of Labor Statistics of the U.S. Department of Labor (including the Producer Price Index news releases, PPI Detailed Report, and Producer Price Index database published by the U.S. Bureau of Labor Statistics at bls.gov), and the Federal Reserve Bank of St. Louis (including its Federal Reserve Economic Data (FRED) and Archival Federal Reserve Economic Data (ALFRED) databases at fred.stlouisfed.org and alfred.stlouisfed.org).

**Type:** The type of Contract is an Event Contract.

**Issuance:** The Contracts are based on the outcomes of recurrent events. Contract iterations will be issued on a recurring basis, and Contract iterations will generally correspond to each calendar month, calendar quarter, calendar year, or other <time period> for which monthly values of the Corrugated Recyclable Paper PPI are scheduled to be published by the U.S. Bureau of Labor Statistics.

**<measure>:** <measure> refers to the statistic, specified by the Exchange, by which the initially published monthly values of the Corrugated Recyclable Paper PPI for the calendar months <in/at> <time period> are combined or selected to produce a single value. <measure> takes one of the following forms, which together constitute the complete list: (a) "average," meaning the arithmetic mean of the monthly values for all calendar months <in/at> <time period>, calculated as the sum of those monthly values divided by the number of those calendar months; (b) "highest," meaning the greatest of the monthly values for the calendar months <in/at> <time period>; (c) "lowest," meaning the least of the monthly values for the calendar months <in/at> <time period>; and (d) "value," meaning, where <time period> consists of a single calendar month, the monthly value for that calendar month. Only complete calendar months are counted; a calendar month of which only part falls <in/at> <time period> is not counted. Where "before" is

specified, <time period> begins at Issuance. Each monthly value is the value for that reference month as initially published by the U.S. Bureau of Labor Statistics, to the precision published (currently three (3) decimal places). An average is rounded to three (3) decimal places, with a fourth decimal digit of five (5) or greater rounded up and a fourth decimal digit of four (4) or less rounded down. The Exchange may list iterations of the Contract corresponding to variations of <measure>.

**<in/at>:** <in/at> refers to whether the Contract is determined on the basis of the initially published monthly values for the calendar months falling within <time period> ("in") or on the basis of the initially published monthly value for a single discrete calendar month that <time period> specifies (e.g., March 2027) ("at").

**<time period>:** <time period> refers to a specific range of time as specified by the Exchange. This may be defined by exact dates (e.g., "between January 1, 2026, and December 31, 2026"), relative markers (e.g., "before July 1, 2027"), an event, or broader intervals (e.g., "Q1 2027," "January–March 2026"). "Between" is inclusive of both endpoints, while "before" and "after" exclude the specified date unless stated otherwise. <time period> may also refer to "Any" or "None", to multiple dates (even if non-consecutive), or to a singular and discrete date or time. Unless otherwise specified, the timezone shall be understood to be in Eastern Time.

**<above/below/exactly/at least/at most/between>:** <above/below/exactly/at least/at most/between> refers to comparison operators specified by the Exchange. "Above X" means strictly greater than X (>X). "Below X" means strictly less than X (<X). "Exactly X" means equal to X (=X), measured to the precision specified elsewhere in the Contract. "At least X" means greater than or equal to X (≥X). "At most X" means less than or equal to X (≤X). "Between X and Y" means greater than or equal to X and less than or equal to Y (≥X and ≤Y), i.e., inclusive of both endpoints, unless otherwise specified. The Exchange may list iterations of the Contract corresponding to variations of <above/below/exactly/at least/at most/between>.

**<value>:** <value> refers to a level of the Corrugated Recyclable Paper PPI, expressed in index points on the Index June 2006=100 basis, specified by the Exchange; where <above/below/exactly/at least/at most/between> is "between," <value> refers to two such levels. The Exchange may list iterations of the Contract with <value> levels that fall within an inclusive range beginning at 0 (zero) index points and ending at 300 (three hundred) index points at consecutive increments of 0.001 (one one-thousandth) of an index point. Due to the potential for variability in the Underlying, the Exchange may modify <value> levels in response to suggestions by Members.

**Payout Criterion:** The Payout Criterion for the Contract encompasses the Expiration Values that the <measure> of the Corrugated Recyclable Paper PPI <in/at> <time period> is <above/below/exactly/at least/at most/between> <value>.

**Additional Clarifications:**

*Calculation and Comparison:*

- For the avoidance of doubt, the <measure> is calculated once, from the monthly values for the calendar months <in/at> <time period>, and produces a single value; that single value is the applicable value compared against <value> under <above/below/exactly/at least/at most/between>, and no individual monthly value need separately satisfy the comparison criterion.
- For the avoidance of doubt, where <in/at> is "in" and <time period> is "Q1 2027," the calendar months counted are January 2027, February 2027, and March 2027, and the average is the sum of the three initially published monthly values divided by three (3).
- A monthly value belongs to its reference month, not to the month in which it is published. For example, the value for March 2027, which the U.S. Bureau of Labor Statistics ordinarily first publishes in April 2027, counts toward a Contract for Q1 2027, and a value for April 2027 does not, regardless of when either is published.
- Only the not seasonally adjusted Corrugated Recyclable Paper PPI on the Index June 2006=100 basis is used. Seasonally adjusted values, values on any other base period, percent changes, and any other index or price assessment for recovered paper are not used.

*Source, Revisions, and Corrections:*

- The monthly value used for each reference month is the value the U.S. Bureau of Labor Statistics initially publishes for that month, including where the U.S. Bureau of Labor Statistics designates that value as preliminary. Revisions that the U.S. Bureau of Labor Statistics publishes in the ordinary course of its revision schedule (currently, a single revision four (4) months after initial publication) are not corrections for purposes of this Contract and are not accounted for, whether published before or after Expiration.
- If a Source Agency publishes a value and subsequently corrects, retracts, or removes that value prior to Expiration, other than through a scheduled revision described above, the corrected value governs only if the Exchange determines, in its sole discretion, that the correction remedies a material error in the initial value; otherwise, the initial value governs as set forth below. Corrections, retractions, or removals published after Expiration will not be accounted for in determining the Expiration Value.
- Only values reported in the initial report for each reference month shall be used for the purpose of resolution unless otherwise explicitly specified by the Exchange; for this Contract, the initial report is the first publication of that month's value by the U.S. Bureau of Labor Statistics, even though it is designated preliminary. Corrections that the Exchange determines, in its sole discretion, do not remedy a material error shall not supersede earlier values.
- If the Exchange determines, in its sole discretion, that the initial publication of any monthly value counted toward the Underlying contains a material error, it may delay

Expiration until the earlier of (i) publication of revised data or (ii) the Expiration Date. If no reliable data is available by the Expiration Date, all markets will resolve to the last fair price, as determined by the Exchange in its sole discretion, unless a "No data" strike is listed, in which case the "No data" strike will resolve Yes and all others will resolve No.

- The Federal Reserve Bank of St. Louis's FRED database displays the Corrugated Recyclable Paper PPI as most recently revised. Where a current FRED observation differs from the value the U.S. Bureau of Labor Statistics initially published because of a scheduled revision, the initially published value, as shown in the U.S. Bureau of Labor Statistics' release for that month or in the corresponding ALFRED vintage, governs.
- If the Source Agencies conflict as to the initially published value of the Corrugated Recyclable Paper PPI for any reference month, the hierarchy set out in Source Agency above will govern.

*Series Continuity and Unavailable Data:*

- If, prior to Expiration, the U.S. Bureau of Labor Statistics renames, recodes, reclassifies, or otherwise reidentifies series WPU09120325, but continues to publish the monthly not seasonally adjusted Producer Price Index for corrugated recyclable paper on the Index June 2006=100 basis under the same or a successor series identifier reflecting the continuation of the same index, that continued record governs and the Contract remains open.
- If the U.S. Bureau of Labor Statistics discontinues the index, or ceases to publish it on the Index June 2006=100 basis, and no successor continues that record, the affected monthly values are treated as not published.
- If, by the Expiration Date, the U.S. Bureau of Labor Statistics has not initially published a value for one or more calendar months counted toward the Underlying (e.g., because the index is not published for that month or a release is delayed), the Contract will resolve Yes or No only if the values that have been initially published determine the outcome irrespective of the missing value or values (e.g., a Contract on whether the highest is above a given level, where a published monthly value already exceeds that level); otherwise, the no-data clarification below governs.
- If there is no data for the Underlying published by the Source Agencies by the Expiration Date, all markets will resolve to the last fair price, as determined by the Exchange in its sole discretion, unless a "No data" strike is listed, in which case the "No data" strike will resolve Yes and all others will resolve No.

**Examples that would resolve the market to Yes:**

*Assuming <measure> is "average," <in/at> is "in," <time period> is "Q1 2027," <above/below/exactly/at least/at most/between> is "above," and <value> is 60.000 index points:*

- The U.S. Bureau of Labor Statistics initially publishes values of 72.000 for January 2027, 74.000 for February 2027, and 76.000 for March 2027. The Contract for the average in

Q1 2027 above 60.000 index points will resolve Yes, because the average of 74.000 is greater than 60.000.

- The initially published values are 58.500 for January 2027, 60.200 for February 2027, and 63.000 for March 2027. The Contract for the average in Q1 2027 above 60.000 index points will resolve Yes, because the average of 60.567 is greater than 60.000, even though the January 2027 value alone is below 60.000.
- The initially published values are 60.000, 60.000, and 60.002 for January, February, and March 2027. The Contract for the average in Q1 2027 above 60.000 index points will resolve Yes, because the unrounded average of 60.000667 rounds to 60.001, which is greater than 60.000.
- The March 2027 value is first published in mid-April 2027, after Q1 2027 has ended, and the three initially published Q1 2027 values average 65.000. The Contract for the average in Q1 2027 above 60.000 index points will resolve Yes, because a monthly value counts toward its reference month regardless of when it is published.

**Examples that would NOT resolve the market to Yes:**
*Assuming <measure> is "average," <in/at> is "in," <time period> is "Q1 2027," <above/below/exactly/at least/at most/between> is "above," and <value> is 60.000 index points:*

- The initially published values are 55.000 for January 2027, 57.000 for February 2027, and 59.000 for March 2027. The Contract for the average in Q1 2027 above 60.000 index points will resolve No, because the average of 57.000 is not greater than 60.000.
- The initially published values are 59.000, 60.000, and 61.000 for January, February, and March 2027. The Contract for the average in Q1 2027 above 60.000 index points will resolve No, because the average of exactly 60.000 is not strictly greater than 60.000.
- The initially published values are 60.000, 60.000, and 60.001 for January, February, and March 2027. The Contract for the average in Q1 2027 above 60.000 index points will resolve No, because the unrounded average of 60.000333 rounds to 60.000, which is not greater than 60.000.
- The initially published values are 70.000 for January 2027, 52.000 for February 2027, and 55.000 for March 2027. The Contract for the average in Q1 2027 above 60.000 index points will resolve No, because the average of 59.000 is not greater than 60.000, even though the January 2027 value alone exceeds 60.000.
- The initially published Q1 2027 values average 58.000, and the April 2027 value is later published at 80.000. The Contract for the average in Q1 2027 above 60.000 index points will resolve No, because April 2027 is not a calendar month in Q1 2027 and the Q1 2027 average is not greater than 60.000.

If a natural person who is the primary subject of a Contract's Underlying or Payout Criterion dies prior to Expiration, or if an act or attempted act of violence, assassination, or terrorism directly prevents, interrupts, or causes the event that is the primary subject of a Contract's Underlying or

Payout Criterion, Kalshi may, in its sole discretion, settle the Contract at the last traded price prior to the death or act. If Kalshi determines that trading activity was materially affected by the circumstances giving rise to the death or act, Kalshi may instead use the last traded price prior to such circumstances becoming known or reasonably anticipated by market participants. For purposes of this Rule, Kalshi may rely on an approximate time where the precise time is unknown or cannot be reasonably determined. If Kalshi determines that no last traded price represents a fair settlement, the Outcome Review Committee shall determine the fair settlement price. Kalshi may halt or pause trading in any such Contract (with public notice on Kalshi's website or the Platform) if it reasonably believes that a death or act of terrorism subject to this Rule has occurred, is imminent, or that circumstances giving rise to such an occurrence may be happening. Determinations of Kalshi and the Outcome Review Committee under this Rule are final and not subject to review.

**Minimum Tick:** The Minimum Tick size for the Contract shall be $0.01.

**Position Accountability Level:** The Position Accountability Level for the Contract shall be $25,000 per strike, per Member.

**Last Trading Date:** The Last Trading Date of the Contract will be the final day of <time period>. The Last Trading Time will be one minute prior to the end of <time period>.

**Settlement Date:** The Settlement Date of the Contract shall be no later than the day after the Expiration Date, unless the Market Outcome is under review pursuant to Rule 7.1.

**Expiration Date:** The latest Expiration Date of the Contract shall be ninety (90) days after the scheduled release date of the Corrugated Recyclable Paper PPI for the last calendar month <in/at> <time period>. If an event described in the Payout Criterion occurs, expiration will be moved to an earlier date and time in accordance with Rule 7.2. In the case where data is expected to be delayed and later released, the Exchange may, in its sole discretion, move the Expiration Date in line with Rule 7.2.

**Expiration time:** The Expiration time of the Contract shall be 10:00 AM ET.

**Settlement Value:** The Settlement Value for this Contract is $1.00.

**Expiration Value:** The Expiration Value is the value of the Underlying as documented by the Source Agency on the Expiration Date at the Expiration time.

**Contingencies:** Before Settlement, Kalshi may, at its sole discretion, initiate the Market Outcome Review Process pursuant to Rule 7.1 of the Rulebook. If an Expiration Value cannot be

determined on the Expiration Date, Kalshi has the right to determine payouts pursuant to Rule 7.1 in the Rulebook.

## APPENDIX B – TRADING PROHIBITIONS

In addition to the general prohibition against trading on material nonpublic information, the Exchange will institute additional prohibitions for trading the contract. Persons under 18 years of age are not permitted to create Kalshi accounts. The following individuals will be prohibited from trading:

- Any employee, officer, contractor, or agent of the U.S. Bureau of Labor Statistics or the U.S. Department of Labor involved in collecting, processing, calculating, reviewing, or publishing the Producer Price Index, or who otherwise has access to the Corrugated Recyclable Paper PPI or its underlying price reports prior to publication.
- Any person who prepares, submits, or has access to price reports submitted to the U.S. Bureau of Labor Statistics for the Corrugated Recyclable Paper PPI on behalf of a reporting establishment.
- Any person with access to the Producer Price Index prior to its official release, including under any pre-release or lock-up arrangement.
- Any employee, officer, contractor, or agent of a Source Agency listed in Appendix A with access to material nonpublic information relating to the Underlying.
- Any person who otherwise has the ability to influence, or has advance knowledge of, the Corrugated Recyclable Paper PPI for any calendar month <in/at> <time period> prior to its publication.
- The immediate family members and members of the same household of any person described above