

BLOOMBERG SEF LLC

NOTICE OF DISCIPLINARY ACTION

PARTICIPANT: Bank of America, National Association ("**BOA**")

RULE VIOLATION: RULE 516.A. Trade Cancellation, Correction, Offset and Adjustment – Cleared Swaps

A Trade in a Cleared Swap executed on or pursuant to the Rules of the SEF operated by BSEF can be cancelled, corrected, offset or adjusted only in accordance with Rule 516.A.

FINDINGS: On August 5, 2025, BOA, in executing offsetting and correcting trades in the CAD OIS 15 Year ("**CAD 15yr**") swap contract on BSEF with another Participant, violated BSEF Rule 516.A.

BSEF Rule 516.A(d) requires Participants to notify BSEF of any error trades and, as applicable, take corrective action either by using functionality approved by BSEF ("**Ticket Notification**") or by notifying the BSEF Support Desk within 24 hours after the execution of an offsetting and/or correcting trade ("**Voice Notification**"), as specified in Notice to Participants 2024-R-04. BOA violated BSEF Rule 516.A as it failed to use either Ticket Notification or Voice Notification to provide notice to BSEF's Compliance Department of the execution of offsetting and correcting trades.

The violations did not result in financial harm to customers.

PENALTY: On March 24, 2026, pursuant to BSEF Rule 612, the BSEF Chief Compliance Officer, in accordance with an accepted settlement offer, issued a Written Decision ordering BOA to pay \$50,000 for its violations of BSEF Rule 516.A.

EFFECTIVE DATE: April 22, 2026