

**BLOOMBERG SEF LLC**

**NOTICE OF DISCIPLINARY ACTION**

---

**PARTICIPANT:** Citibank, National Association ("Citi")

**RULE VIOLATION:** RULE 516 Trade Cancellation, Correction, Offset and Adjustment – General

Any Trade executed on the SEF Platform operated by BSEF or in accordance with BSEF Rules can be canceled, corrected, adjusted or offset only in accordance with Rule 516.

**FINDINGS:** On November 7, 2024, Citi, in executing offsetting and correcting trades in the CAD OIS 2Y Swap ("CAD02") vs 25m CAD OIS 10Y Swap ("CAD10") ("2y/10y") swap on BSEF with another Participant, violated BSEF Rule 516.

Specifically, BSEF Rule 516.A(a) 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. Citi violated BSEF Rule 516 as it failed to use either Ticket Notification or Voice Notification to provide notice to BSEF's Compliance Department of the execution of an offsetting trade and/or correcting trade.

The violation did not result in financial harm to customers.

**PENALTY:** On December 3, 2025, pursuant to BSEF Rule 612, a BSEF Disciplinary Panel, in accordance with an accepted settlement offer, issued a Decision ordering Citi to pay \$50,000 for its violation of BSEF Rule 516.

**EFFECTIVE DATE:** January 2, 2026