

BLOOMBERG SEF LLC

NOTICE OF DISCIPLINARY ACTION

PARTICIPANT: Citibank, National Association (“Citi”)

RULE VIOLATION: RULE 410 Responsibility for Mandatory Trading

Each Participant that is a Swap Dealer or Major Swap Participant shall be responsible for compliance with the mandatory trading requirement under Section 2(h)(8) of the CEA.

FINDINGS: On multiple occasions between August 30, 2021 and August 29, 2023, Citi executed multiple large Block Trades that consisted of smaller executions (i.e., “clips”) at prevailing market prices that were then aggregated into one notional quantity executed at a volume weighted average price (“VWAP”).

Pursuant to Rule 410, “[e]ach Participant that is a Swap Dealer or Major Swap Participant shall be responsible for compliance with the mandatory trading requirement under Section 2(h)(8) of the CEA.” Citi violated BSEF Rule 410 by failing to comply with the mandatory trading requirement for the clips in violation of the Rule.

The violation did not result in financial harm to customers.

PENALTY: On February 9, 2026, pursuant to BSEF Rule 612, the BSEF Chief Compliance Officer, in accordance with an accepted settlement offer, issued a Written Decision ordering Citi to pay \$67,500 for its violations of BSEF Rule 410.

EFFECTIVE DATE: March 10, 2026