

BLOOMBERG SEF LLC

NOTICE OF DISCIPLINARY ACTION

PARTICIPANT: Canadian Imperial Bank of Commerce ("**CIBC**")

RULE VIOLATION: RULE 516 Trade Cancellation, Correction, Offset and Adjustment

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

(d) Notification of Action Taken and Trade Review – Cleared Swaps Executed on a Non-Anonymous Basis – If Participants involved in a Trade agree that the Trade is an Error Trade and that the cancellation, correction, offset or adjustment of the Error Trade is appropriate and will not adversely impact market integrity, facilitate market manipulation, or other illegitimate activity, or otherwise violate the Rules, Participants may either execute solely an Offsetting Trade or may execute both an Offsetting Trade and a corresponding Correcting Trade as provided in the Rule.

FINDINGS: On April 7, 2025, CIBC, in executing offsetting and correcting trades in the Bank of Canada short term swap ("**CAD FWD 4th Contract**") on BSEF with another Participant, violated BSEF Rule 516. Specifically, 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. CIBC 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 August 4, 2025, pursuant to Rule 621, a summary fine in the amount of \$10,000 was assessed against CIBC for its violation of BSEF Rule 516.

EFFECTIVE DATE: September 3, 2025