

BLOOMBERG SEF LLC

NOTICE OF DISCIPLINARY ACTION

PARTICIPANT: Goldman Sachs International (“GSI”)

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 three dates between October 10, 2025 and March 30, 2026, GSI executed 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 “blended,” “average,” or “weighted” execution price.

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.” GSI 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 September 1, 2026, pursuant to BSEF Rule 612, the BSEF Chief Compliance Officer, in accordance with an accepted settlement offer, issued a Written Decision ordering GSI to pay \$30,000 for its violations of BSEF Rule 410.

EFFECTIVE DATE: September 30, 2026