

BLOOMBERG SEF LLC

NOTICE OF DISCIPLINARY ACTION

PARTICIPANT: Barclays Bank PLC ("**Barclays**")

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

Trades that have not been executed on or pursuant to the Rules of the SEF operated by BSEF are ineligible to be cancelled, corrected, offset or adjusted pursuant to this Rule.

FINDINGS: On March 19, 2026, Barclays, in executing trades in the CDX HY CDSI S45 5Y PRC ("**CXPHY545**") swap contract with another Participant on BSEF, violated BSEF Rule 516. Specifically, pursuant to BSEF Rule 516, "[t]rades that have not been executed on or pursuant to the Rules of the SEF operated by BSEF are ineligible to be cancelled, corrected, offset or adjusted pursuant to this Rule." Barclays violated BSEF Rule 516 in offsetting and correcting an Error Trade not originally executed on BSEF.

The violation did not result in financial harm to customers.

PENALTY: On June 15, 2026, pursuant to BSEF Rule 612, the BSEF Chief Compliance Officer, in accordance with an accepted settlement offer, issued a Written Decision ordering Barclays to pay \$5,000 for its violations of BSEF Rule 516.

EFFECTIVE DATE: July 15, 2026