

BLOOMBERG SEF LLC

NOTICE OF DISCIPLINARY ACTION

PARTICIPANT: Royal Bank of Canada (“RBC”)

RULE VIOLATION: RULE 506.B. Pre-Arranged Transactions

No Participant, Account Manager, DMA Customer or Authorized Trader shall engage in a pre-arranged transaction except as permitted by Rules 516, 521 or 531.

RULE 514. Misuse of the SEF Operated by BSEF or the SEF Platform

Misuse of the SEF operated by BSEF is strictly prohibited.

FINDINGS: On September 29, 2025 and January 21, 2026, RBC, in executing transactions in the USD CDX HY CDSI S45 5y PRC swap contract with another Participant, violated BSEF Rules 506.B and 514.

Pursuant to Rule 506.B, “[n]o Participant...shall engage in a pre-arranged transaction except as permitted by Rules 516, 521 or 531.” As the Trades were not exempt from the pre-arrangement prohibitions of Rule 506.B, RBC violated BSEF Rule 506.B by engaging in pre-arranged transactions.

Pursuant to Rule 514, it shall be deemed an act detrimental to the interest and welfare of the SEF operated by BSEF to, among other things, use the SEF Platform in a manner contrary to the Rules. RBC violated Rule 514 when it used the SEF Platform to execute test trades.

The violations did not result in financial harm to customers.

PENALTY: On September 9, 2026, pursuant to BSEF Rule 612, the BSEF Chief Compliance Officer, in accordance with an accepted settlement offer, issued a Written Decision ordering RBC to pay \$5,000 for its violations of BSEF Rule 506.B. and Rule 514.

EFFECTIVE DATE: October 7, 2026