

GFI SWAPS EXCHANGE LLC NOTICE OF DISCIPLINARY ACTION

Notice of Penalty #: 2022-01

Effective Date: November 18, 2022

Introducing Broker: GFI Securities Limited

GFI SEF Rule 529 Simultaneous Buying and Selling Orders

(a) Opposite Orders for different beneficial owners that are simultaneously placed by a Participant or Sponsored Access Firm with discretion (including time and price discretion) over both accounts may be entered into the Trading Platform, as long as one Order is exposed for a minimum of fifteen second

Findings:

On September 8, 2022, GFI Securities Limited violated GFI SEF Rule 529(a): Simultaneous Buying and Selling Orders, by exposing a pre-discussed Required Transaction on the Electronic Trading System for less than the required 15 seconds.

Penalty:

The SEF's Disciplinary Committee issued a monetary fine of \$5,000 to GFI Securities Limited for its violation of GFI SEF Rule 529(a): Simultaneous Buying and Selling Orders.