



Tradition SEF, Inc.

Participant Notice 19-03
CFTC Submission No. 2019-02
Tradition SEF Notice of Change in the Volatility Swap Calculation Formula in Tradition SEF's Equity Asset Class

April 1, 2019

To : Tradition SEF Authorized Representatives
From : Tradition SEF Operations and Compliance

Authorized Representatives,

Pursuant to Section 5c(c) of the Commodity Exchange Act, as amended (the "Act"), and Commodity Futures Trading Commission ("CFTC" or the "Commission") Regulation 40.6(a), Tradition SEF, Inc. ("Tradition SEF") has filed CFTC Submission No. 2019-02 with the Commission to amend the Tradition SEF Equity Product Listing (the "Product Listing"), effective as of April 15, 2019.

Tradition SEF amended the Product Listing to conform the calculation of Volatility Swaps to industry protocol. The revised formula for calculating actual realized daily volatility is detailed in Section (II)(3) (Terms and Conditions) of the Product Listing. Tradition SEF has posted a copy of CFTC Submission No. 2019-02, a notice of pending certification with the Commission and the Platform Supplement to its website at <http://www.traditionsef.com/regulatory/>, concurrent with the filing of this submission with the Commission.

Tradition SEF, through its submission to the CFTC, certifies that the rule amendments comply with the Act and the Commission's regulations promulgated thereunder.

For Tradition SEF legal matters, please contact:

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