

Tradition SEF, LLC

Participant Notice 22-03

Notice to Participants Concerning Office of Foreign Assets Control (OFAC) Sanctions, and a Reminder of Certain Obligations Under Tradition SEF Rules, and Cybersecurity Awareness.

March 3, 2022

To: Tradition SEF Authorized Representatives **From:** Tradition SEF Legal and Compliance

Due to the recently issued sanctions by the U.S. government, we encourage all participants to routinely monitor the Department of Treasury's Office of Foreign Asset Control (OFAC) website for more information on current sanctions at: https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information. Questions about the details of OFAC's sanctions should be directed to OFAC at (800) 540-6322.

We also remind all Participants about their responsibilities concerning prohibited customers under The SEF Rulebook, in particular under SEF Rule 302(a)(6), Rule 302(a)(7), and Rule 302(a)(8), as well as the customer screening requirements detailed in Rule 304 (a)(6). Participants should be mindful to routinely verify that their customers are not listed on OFAC's sanction lists.

Cybersecurity remains one of the principal operational risks facing financial institutions. Although we are not aware of any specific threat in the U.S., in light of the increase in the possibility of global cybersecurity risks, we also recommend all participants maintain appropriate cybersecurity programs and controls and boost employee awareness.

For SEF compliance or administrative questions please contact:

Eric Earnhardt, CCO: (212) 791-3497 or eric.earnhardt@tradition.com
Jeff Mehan, CAO: (212) 943-4567 or jeff.mehan@tradition.com

For legal matters, please contact:

Bennett Kirschner, General Counsel: (212) 377-2337 or bennett.kirschner@tradition.com