



TRADITION SEF, LLC

Bennett Kirschner

General Counsel and Secretary

February 18, 2026

VIA CFTC Portal

Mr. Christopher Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**RE: CFTC Regulation 40.6(a) Certification.
Notification of amendments to the Fee Schedule.
Tradition SEF CFTC Submission 2026-02.**

Dear Mr. Kirkpatrick:

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, LLC (“Tradition SEF”) hereby notifies the Commission of amendments to its Fee Schedule and other matters as described below and in Exhibit A, effective April 1, 2026, subject to the CFTC filing review. A concise explanation of the Fee Schedule Amendments is listed in Exhibit A below. A redacted Fee Schedule is listed in Exhibit B.

Tradition SEF notifies the Commission of the amendments to its Fee Schedule.

A concise explanation of the Rulebook Amendments is in Exhibit A below. A redlined Fee Schedule is listed in Exhibit A.

[REDACTED]

We have identified in Exhibit A the rule modifications and compliance with the SEF core principles (“Core Principles”) as set forth in Section 5h of the Commodity Exchange Act and Part 37 of the Commission’s regulations promulgated thereunder.

Tradition SEF continues to be in compliance with applicable provisions of the Act, including the Core Principles. In particular, Tradition SEF has determined that it is in compliance with Core Principles 1 (Compliance with Core Principles) and 2 (Compliance with Rules), as further described in the compliance chart attached as Exhibit A.

Pursuant to Section 5c(c) of the Act and CFTC Regulations 40.6(a) Tradition SEF hereby certifies that the rule amendments comply with the Commodity Exchange Act and the Commission's regulations promulgated thereunder. No substantive opposing views were expressed that were not incorporated into the rule amendments. Tradition SEF hereby certifies that it has posted a notice of pending certification with the Commission and a copy of the submission on its website (*see* <http://www.traditionsef.com/regulatory/>), concurrent with the filing of this submission with the Commission.

Should you require additional information related to this submission, please contact the undersigned at (212) 377-2337 or bennett.kirschner@tradition.com. Please reference Tradition SEF CFTC Submission 2026-02 in any related correspondence.

Sincerely,

Bennett Kirschner

General Counsel and Secretary

Att.:
Exhibit A (Amendments to the Fee Schedule)
Exhibit B (CONFIDENTIAL TREATMENT REQUESTED)

EXHIBIT A

Amendments to the Fee Schedule

Rule, Appendix or Platform Supplement	Change	Explanation and Analysis of the operation, purpose, and effect of the proposed rule or rule amendment and its compliance with applicable provisions of the Act, including core principles, and the Commission's regulations thereunder.
Fee Schedule	<ul style="list-style-type: none">• [REDACTED]	<p>The changes to the fee schedule demonstrates Tradition SEF's adherence to open access principles. Accordingly, Tradition is promoting a fair, transparent platform. The changes to the fee schedule comply with Core Principle 2 (Compliance with Rules) and specifically with CFTC Rule 37.202, which requires impartial access to the SEF and transparent criteria governing access that is applied in a fair and nondiscriminatory manner. CFTC Rule 37.202 also requires a SEF to require that an eligible contract participant ("ECP") consent to its jurisdiction before the ECP can access the SEF. By complying with Core Principle 2, Tradition SEF demonstrates its compliance with Core Principle 1 (Compliance with Core Principles) and CFTC Regulation 37.100, which requires that a SEF comply with any requirement that the CFTC may impose by rule or regulation.</p>

EXHIBIT B

CONFIDENTIAL TREATMENT REQUESTED