



TRADITION SEF, LLC

Bennett Kirschner
General Counsel and Secretary

February 3, 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) Rulebook Amendment - Tradition SEF CFTC Submission 2026-01, Request for New Product Certification of Tradition SEF's Interest Rate Swap Product Listing to add Polish Short-Term Rate (POLSTR) Interest Rate Swaps in Appendix A of the Rulebook

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" or "The SEF") hereby notifies the Commission that it wishes to amend its Rulebook as provided herein and the attached Appendix A regarding the listing of the Polish Short-Term Rate ("POLSTR") Index as a benchmark for interest rate swaps offered for trading.

The effective date for this amendment is February 18, 2026.

Tradition SEF is a swap execution facility. It does not own the products executed through its services or maintain open interest as the rule contemplates open interest. Positions resulting from transactions on Tradition SEF are maintained by the counterparties to the transactions at Designated Clearing Organizations or bilaterally between the counterparties.

Redlined and final versions of Appendix A version 13 (Interest Rate Swap Product Listing) of the Tradition SEF Rulebook, are attached hereto to reflect the changes.

Please note that Tradition SEF CFTC Submission 2026-01 includes the following revisions to the Interest Rate Swap Product Listing:

The listing of interest rate swaps on the Polish Short-Term Rate ("POLSTR") Index in Appendix A of the Rulebook. No substantive opposing views were expressed that were not incorporated into the product amendments. Tradition SEF hereby certifies that it has posted a notice of this pending delisting 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 2026-01 in any related correspondence.

Sincerely,

Bennett Kirschner
General Counsel and Secretary

Att.
Exhibit A
Exhibit B

EXHIBITS

- A) Rulebook-Appendix A v13 Tradition SEF Interest Rate Swap Product Listing [FINAL]**
- B) Redline of Rulebook-Appendix A v12 compared to v13 Tradition SEF Interest Rate Swap Product Listing.**