

2025 Disciplinary Actions As of June 10, 2025

The following is a list of disciplinary actions that have resulted in the imposition of penalties for violations of specified provisions of the federal securities laws and/or the Constitution and Rules of the Exchange. New actions are added to the list as and when they are finalized.

A. Disciplinary Sanctions Imposed Pursuant to BOX Rule 12030, Letters of Consent:

- Barclays Capital Inc. (“Barclays” or “the Firm”) was censured and fined a total of \$2,250,000, of which \$115,500 is payable to BOX. FINRA, on behalf of BOX, conducted a review of the Firm and determined that, between May 2012 and April 2025, Barclays failed to establish, maintain, enforce and keep current a system of compliance and supervisory controls, including written supervisory procedures (“WSPs”), reasonably designed to achieve compliance with applicable securities laws, regulations, and rules prohibiting layering and spoofing of U.S. equity and index options (“options”) in violation of BOX Rules 3010, 3070(a)(1), and 7000(c)(4). Further, between May 2012 and April 2025, Barclays failed to establish, document, and maintain reasonably designed post-trade regulatory risk management controls ensuring that appropriate surveillance personnel receive immediate post-trade execution reports that monitor for layering and spoofing of options in violation of Section 15(c)(3) of the Securities Exchange Act of 1934 (the “Exchange Act”) and Exchange Act Rule 15c3-5. Additionally, from June 2018 to June 2021, Barclays violated BOX Rules 3010, 3070(a)(1), and 7000(c)(4) by failing to conduct surveillance for potential anticipatory hedging activity in certain exchange traded fund (“ETF”) transactions.