CME SEF RECORDKEEPING AND REPORTING PROCEDURES

1. **Swap Transaction and Pricing Data**

   All swap transactions entered into on CME SEF are reported to CME SDR as soon as technologically practicable after their execution. Swap transaction and pricing data entered through Globex or ClearPort (for block trades) are transmitted without delay to all downstream systems. It is possible that swap transaction and pricing data could be disclosed on the trading screen prior to public dissemination by CME SDR. In the event that such data is disclosed on the trading screen prior to public dissemination by CME SDR, this disclosure is seen only by CME SEF Market Participants and is visible to all CME SEF Market Participants in a non-discriminatory fashion in compliance with CFTC Regulation 43.3(b)(3).

2. **Errors in Reported Data**

   If CME SEF becomes aware of an error or omission in the swap transaction or pricing data reported to CME SDR or receives notification from a reporting party pursuant to CME SEF Rule 528B that an error or omission in reporting occurred, it promptly submits corrected data to CME SDR in compliance with CFTC Regulation 43.3(e)(1).

   As required by Regulation 43.3(e)(2), CME SEF will not submit a cancellation or correction of swap transaction or pricing data to CME SDR for the purpose of gaining or extending a delay in the public dissemination of accurate swap transaction or pricing data or to otherwise evade the reporting requirements of Part 43. CME SEF further will not submit a cancellation or correction of swap transaction or pricing data received from a reporting party pursuant to CME SEF Rule 528B if it believes that the reporting party has submitted the cancellation or correction to CME SEF for the purpose of gaining or extending a delay in the public dissemination of accurate swap transaction or pricing data or to otherwise evade the reporting requirements of Part 43.

3. **Technical Problems in SDR**

   If CME SDR encounters technical problems and is unable to receive or hold in queue swap transaction and pricing data, CME SEF re-reports all data not properly received by the CME SDR as soon as it receives notice that CME SDR has resumed normal operations, in compliance with Regulation 43.3(g)(2).

4. **Swap and Counterparty Identification**

   CME SEF generates and assigns a Unique Swap Identifier (“USI”) for each swap executed on or pursuant to the rules of CME SEF at or as soon as technologically practicable following the time of execution of the swap and prior to the reporting of swap creation data to CME SDR in compliance with Regulation 45.5(a)(1). The USI includes, in a single data field: (i) the unique alphanumeric code assigned to CME SEF by the Commission; and (ii) an unique alphanumeric code automatically
generates and assigns the swap by CME SEF systems. CME SEF electronically transmits the USI to: 1) CME SDR, as part of its report of required swap creation data; 2) each counterparty to the swap, as soon as technologically practicable after the execution of the swap; and 3) CME’s DCO, as a part of its report of required swap creation data, all as required by Regulation 45.4(a)(2). The USI for the swap is included in all reporting concerning the swap in compliance with Regulation 45.5(e) for the entire lifecycle of the swap regardless of any lifecycle events or changes in state data including, but not limited to, any changes with respect to the counterparties to or the ownership of the swap. In the case of pre-allocation swaps executed on or pursuant to the rules of CME SEF, the USI is included in the swap creation data reported to the CME SDR and transmitted to the reporting counterparty and the agent in compliance with Regulation 45.5(d)(1)(i).

As required by Regulation 45.6, counterparties to any swap executed on CME SEF are identified by their Legal Entity Identifiers (“LEIs”) in all reporting pursuant to Part 45 of the Commission regulations.

5. Recordkeeping

CME SEF keeps all records required by and under the terms of Regulation 45.2. More specifically, CME SEF keeps full, complete, and systematic records, together with all pertinent data and memoranda, of all activities related to the business of the CME SEF with respect to swaps, including all records required by Part 37, all as required by Regulation 45.2(a). All records CME SEF is required by Commission regulation to keep are retrievable and reportable in compliance with Regulation 45.2(d).

CME SEF keeps all records with respect to each swap throughout the life of the swap and for a period of at least 5 years following the termination of the swap as required by Regulation 45.2(c). All records of the swap include its USI for at least as long as those records are required by the CEA or the Commission to be kept. Further, in compliance with Regulation 45.6, counterparties to any swap executed on or pursuant to the rules of CME SEF are identified by their LEIs in all records kept pursuant to Part 45. All records required by Commission regulation are readily accessible via real time electronic access by CME SEF throughout the life of the swap and for two years following the final termination of the swap and are retrievable by CME SEF within 3 business days throughout the remainder of the required retention period as required by Regulation 45.2(e)(1). All records required under the CEA and CFTC Regulations are open to the inspection under the procedures of CME SEF Rule 415 upon request by representatives of the CFTC, Department of Justice, Securities and Exchange Commission, or any representative of a prudential regulator as authorized by the CFTC in compliance with Regulation 45.2(h). CME SEF will also provide electronic or hard copies of required records to any representative at CME SEF’s expense when requested by the CFTC.

In compliance with Regulation 43.3(h)(1), CME SEF time stamps swap transaction and pricing data relating to all publicly reportable swap transactions with a date and time to at least the nearest second of when CME SEF (i) receives such data from a swap counterparty (if applicable); and (ii) transmits such data to a registered SDR for public dissemination. CME SEF maintains records of these time stamps for a period of at least 5 years from the execution of such publicly reportable swap transactions, in compliance with regulation 43.3(h)(4).