



DISCIPLINARY NOTICE

OCTOBER 9, 2015

Matter: CASE number 2013-042

SETTLEMENT OF CHARGES AGAINST BP ENERGY COMPANY

Exchange Rules:

Rule 4.02(c) - Trade Practice Violations

In connection with the placement of any order or execution of any Transaction, it shall be a violation of the Rules for any Person to... [e]xecute a wash sale, accommodation Trade, fictitious sale or prearranged Trade.

Rule 4.07(a)(iii) - Block Trading

The price at which a Block Trade is executed must be fair and reasonable in light of (A) the size of such Block Trade, (B) the price and size of other Trades in the same contract at the relevant time; and (C) the price and size of Trades in other relevant markets, at the relevant time.

Summary:

A subcommittee of the Exchange's Business Conduct Committee determined that on April 11, 2013 BP Energy Company ("BP") may have violated IFUS Rule 4.02(c) when an employee transacted an accommodation trade (buy and sell) that enabled the counterparty to the transaction to correct an erroneous allocation and move a position from one proprietary account belonging to the counterparty to another proprietary account belonging to the counterparty; and IFUS Rule 4.07(a)(iii) by transacting paired block trades at prices that were not fair and reasonable.

Penalty:

In accordance with the terms of settlement, in which BP neither admitted nor denied the rule violation, BP paid a monetary penalty of \$12,500 and agreed to cease and desist from future violations of Rules 4.02(c) and 4.07(a)(iii).

Effective Date: September 30, 2015

FOR MORE INFORMATION

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