

## Notice

### Reminder: KYC/AML Responsibilities Related to Russian Sanctions

In the wake of Russia's invasion of Ukraine, the United States, United Kingdom, European Union and other jurisdictions have each issued sanctions that restrict certain transactions with identified Russian institutions and individuals. Sanctions lists and related information published by the United States Department of the Treasury Office of Foreign Assets Control ("OFAC") are available [here](#). Other jurisdictions and authorities have separate sanctions in place which may be of relevance to members and other market participants of ICE Futures U.S. ("IFUS").

In light of these developments, members and other market participants should review all applicable sanctions and ensure that they have taken necessary steps to maintain compliance with these restrictions. Clearing Members are reminded that IFUS Rule 6.44 provides in part that:

(c) Unless permitted (either not restricted or specifically authorized) by OFAC and/or any Sanctioning Body, as applicable, a Clearing Member:

(i) that maintains, becomes aware that it maintains, or has documentary information that it maintains, positions or carries an account actively trading on the Exchange for or on behalf of a Person that is, or becomes, a Sanctioned Party, shall immediately take steps to (A) cancel all direct and indirect access and authorizations issued to such Sanctioned Party and provide written notice to the Chief Compliance Officer of Market Regulation of such cancellations, or (B) provide written instructions to the Exchange directing the Exchange to assist and coordinate in the cancellation of all access and authorizations for the Sanctioned Party at the Exchange as may be applicable; and

(ii) may not accept as Margin from its account holders any debt or equity issued by Sanctioned Parties, assets in which Sanctioned Parties have any interest, or any other assets that are or would be subject to blocking restrictions or sectoral sanction restrictions imposed by OFAC or are subject to similar restrictions imposed by another Sanctioning Body.

(d) Clearing Members may only carry omnibus accounts for entities that have received a notice from the Clearing Member (A) expressly prohibiting the omnibus account from acting for customers of the Exchange, directly or indirectly, that are Sanctioned Parties and (B) requiring it to send a similar notice to its omnibus account customers.

IFUS Rule 6.44 is available [here](#). The content of this notice should be shared appropriately within your firm to ensure compliance.

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Key Information Documents for certain products covered by the EU Packaged Retail and Insurance-based Investment Products Regulation can be accessed on the relevant exchange website under the heading "Key information Documents (KIDS)," commencing January 1, 2019.