

NATIONAL FUTURES ASSOCIATION  
BEFORE THE  
BUSINESS CONDUCT COMMITTEE

FILED  
JUN 20 2024  
NATIONAL FUTURES ASSOCIATION  
LEGAL DOCKETING

In the Matter of: )  
 )  
CLARKSONS PLATOU FUTURES )  
LIMITED )  
(NFA ID #286412), )  
 )  
Respondent. )

NFA Case No. 24-BCC-005

**DECISION**

Having reviewed all matters relevant to the Complaint issued by the Business Conduct Committee (Committee) of National Futures Association (NFA) against Clarksons Platou Futures Limited (Clarksons) and having considered and accepted the Offer of Settlement (Offer) submitted by Clarksons, the Committee hereby issues this Decision.

I

**ALLEGED VIOLATIONS OF NFA REQUIREMENTS**

On April 24, 2024, the Committee issued a Complaint against Clarksons, a registered introducing broker and approved swap firm and NFA Member headquartered in London, United Kingdom.

The Complaint charged Clarksons with failing to register three individuals as associated persons and NFA Associates, in violation of NFA Bylaw 301(b); failing to keep pre-trade communications, in violation of NFA Compliance Rule 2-10(a); and disclosing confidential information, in violation of NFA Compliance Rule 2-26. The

Complaint also charged Clarksons with failing to supervise, in violation of NFA Compliance Rule 2-9(a).

II

**OFFER OF SETTLEMENT**

Clarksons submitted an Offer in which it neither admitted nor denied the allegations of the Complaint and proposed to settle the charges against it by agreeing to pay a fine of \$250,000 to NFA within 30 days of the effective date of this Decision. Clarksons acknowledged in its Offer that any Decision accepting the Offer would include findings that Clarksons committed the violations alleged against it in the Complaint.

III

**FINDINGS**

Pursuant to the Offer, the Committee finds that Clarksons failed to register three individuals as associated persons and NFA Associates, in violation of NFA Bylaw 301(b); failed to keep pre-trade communications, in violation of NFA Compliance Rule 2-10(a); disclosed confidential information, in violation of NFA Compliance Rule 2-26; and failed to supervise, in violation of NFA Compliance Rule 2-9(a).

IV

**PENALTY**

Having considered the matter and having accepted the Offer submitted by Clarksons, the Committee hereby orders Clarksons to pay a fine of \$250,000 to NFA within 30 days of the effective date of this Decision. This Decision and the Offer shall not be used as the sole basis for any other action or proceeding by NFA against Clarksons, including any registration matter, except that this Decision and the Offer may be used in an action to enforce the terms thereof or in a subsequent disciplinary action

or regulatory action, where they may be considered as disciplinary history and as evidence in aggravation on the issue of sanctions.

**NATIONAL FUTURES ASSOCIATION  
BUSINESS CONDUCT COMMITTEE**

Date: 4/20/2024

By:   
Chair

/tdk/Clarksons Platou Futures Limited (Decision) (Final)