

**EXPRESSION OF INTEREST TO BECOME
A FOREIGN EXCHANGE COUNTERPARTY
Part I***

By submitting these materials, you agree that you will not advertise or include in promotional material or business discussions with any third parties or customers, other than to supervisory or regulatory authorities or as otherwise required by law, your interest in becoming a foreign exchange counterparty or the fact that you have submitted these materials to FRBNY and are under consideration to become a foreign exchange counterparty.

In addition to this form, a prospective foreign exchange counterparty should submit a letter outlining its ability to meet the expectations in the FRBNY Policy on Counterparties for Market Operations and the specific eligibility criteria for foreign exchange counterparties. The letter should include a description of the firm's capabilities in foreign exchange markets and trading activities and volume of activity in the last year in the business areas relevant to the foreign exchange counterparty relationship with the New York Fed. The letter also should discuss how transacting with the New York Fed fits with the firm's current business and long term business plan.

Legal Name & Address of Prospective Counterparty:	Name: Address:
Type of Entity (broker-dealer, government securities broker-dealer, state bank, etc.):	
Primary Business Contact:	Name: Address: Tel: Email:
Primary Legal Contact:	Name: Address: Tel: Email:
Primary Compliance Contact:	Name: Address: Tel: Email:
Legal Name & Address of Ultimate Parent Company (if applicable):	Name: Address:

* Note that this is the first step in the process to become a foreign exchange counterparty. The New York Fed will determine its need for additional foreign exchange counterparties based on its business activity. A firm who appears, from this expression of interest, to meet the eligibility criteria for becoming a foreign exchange counterparty will undergo a more comprehensive consideration process, and will be asked to submit additional information, typically of the sort identified in Part II.

Primary Regulator & Contact at Primary Regulator:	Regulator: Name: Address: Tel: Email:
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**EXPRESSION OF INTEREST TO BECOME
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Part II***

Information Request

A. Organization and Governance

- Copy of the prospective counterparty's original formation documents
- Description of the prospective counterparty's ownership structure, including the following:
 - For beneficial owners:¹ full legal name, biography of individual (including details on professional experience)
 - For control persons:² full legal name, biography (including details on professional experience), relationship to the entity
- Organizational chart of the prospective counterparty and its consolidated group (including ownership and control information for each entity);
- Certificate of good standing or similar document from the jurisdiction of formation.

B. Financial Condition

- Description of financial condition of the prospective counterparty and the consolidated corporate group to which it belongs, including audited financial statements (with notes) from the last three (3) fiscal years, as well as the first half year or most recent quarterly financial statements, whichever is applicable³

C. Regulation

* Note that this is simply a form of typical information request that FRBNY will provide to prospective counterparties that have completed Part I and that appear to be appropriate candidates for further consideration as a foreign exchange counterparty. The actual information request submitted to a particular prospective counterparty may vary depending on a number of factors, including the prospective counterparty's size and business profile. FRBNY may submit multiple information requests to a particular prospective counterparty. A prospective counterparty should not provide this information without first submitting Part I and receiving further direction from FRBNY.

¹For these purposes, a beneficial owner is defined as any individual or entity with a 10 percent or greater direct or indirect beneficial ownership interest in the entity applying for designation as a foreign exchange counterparty.

² For these purposes, a control person includes the senior executives of the prospective counterparty (e.g. CEO, CFO, COO, etc.), members of the Board of Directors, and other principals, general partner(s) or managing member(s) of the prospective counterparty.

³ For a counterparty acting as "agent" for its parent or affiliate the financial condition requirements would apply for the "agent." In addition, the financial condition requirements would also be required for the parent or affiliate represented by the "agent" and the consolidated group to which it belongs.

- Description of the regulatory framework within which the prospective counterparty and other entities within the consolidated corporate family operates (i.e., the primary regulator of the prospective counterparty and the other entities, etc.)
- To the extent permissible under applicable law, regulatory financial reports for the prospective counterparty for the fiscal year end month for the past three (3) years and the most recent regulatory financial report of the current year
- To the extent permissible under applicable law, description of material past or pending legal or regulatory matters involving the prospective counterparty, its beneficial owners or control persons for the last five (5) years⁴

D. Compliance Regime

- Organizational chart of the prospective counterparty's compliance function and biographies for the top three (3) compliance officers
- Description of the prospective counterparty's compliance program regarding business lines or activities relevant to the proposed foreign exchange counterparty relationship, including a description of related policies and procedures, and the roles and responsibilities of the compliance personnel that support the relevant business activities
- Description of the prospective counterparty's Anti-Money Laundering Program, including a description of related policies and procedures, transaction monitoring activities and training program
- Description of the prospective counterparty's program to ensure compliance with sanctions administered by the Office of Foreign Assets Control ("OFAC")
- Copy of the prospective counterparty's policies, procedures, training materials, or other communications regarding the FX market best practices guidance

E. Internal Controls

- Description of the prospective counterparty's internal control environment and corporate governance regarding business lines or activities relevant to the proposed foreign reserve management counterparty relationship, including a description of related policies and procedures
- Business continuity plan or a description of the contingency arrangements with respect to the business areas in the markets relevant to the proposed foreign reserve management counterparty relationship

F. Customer Base

- Description of the prospective counterparty's customer base and distribution network, including types of customers served and geographic distribution of customers.

⁴ For these purposes, a "material" matter includes any matter that typically would require escalation to the senior management of the firm due to potential for reputational damage or legal or regulatory sanction.

- To the extent the prospective counterparty collects such data, highlight:
 - the percentage of customers operating in High Risk industries (as defined in the AML Program) and the percentage of revenues derived from such customers, and
 - the percentage of customers operating in High Risk jurisdictions (as defined in the AML Program) and the percentage of revenues derived from such customers.

G. Other

- Description of the firm's major trading centers
- Description and examples of the type of market-related research reports produced by the firm
- Description of areas of specialty of the firm within the market (client types, product types, etc.)
- Any other information the firm believes the FRBNY may deem relevant
- Other helpful (but not required) information, if available:
 - Rating agency reports
 - Investment analyst reports written about the firm