

Objective 1: Increasing Standardization

Initiative 1 - Standardization Benchmarking Analysis

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
Analyze existing, and where appropriate, potential opportunities for further standardization and a standardization matrix will be completed in partnership with the Supervisors.	<p><i>Commitment 1: Enhance the credit, interest rates and equity derivatives Standardization Matrices and Narratives and institute regular reporting</i></p> <p>By April 30, 2011, the Signatories will agree the structure of the Standardization Matrix and outline of the Standardization Narrative for each asset class. The structure will specify the row-wise product groupings, the column-wise functional areas, and the basic form and content of the qualitative or quantitative data to be reported.</p> <p>By June 30, 2011, the Signatories will agree to the definitions and reporting arrangements required to populate the Standardization Matrices.</p> <p>By September 30, 2011, the Signatories will deliver to supervisors the enhanced and fully populated Standardization Matrices and Narratives.</p>
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
No Commitment	<p><i>Commitment 2: Develop Standardization matrices and Narratives for commodity and foreign exchange derivatives</i></p> <p>By June 30, 2011, the Signatories will work as part of the Commodities Steering Committee (“COSC”) to agree</p> <ol style="list-style-type: none"> i. the structure of an initial version of the Standardization Matrix for the commodity derivatives asset class and ii. an outline of the Standardization Narrative. <p>After delivering the matrix and narrative, the CMD will meet with Supervisors to define an ongoing reporting schedule.</p> <p>By June 30, 2011, the Foreign Exchange/Currency Derivatives Major Dealers (“FXMD”) will agree</p> <ol style="list-style-type: none"> i. the structure of an initial version of the Standardization Matrix, ii. an outline of the Standardization Narrative and iii. a plan and timeline for accomplishing the remaining milestones. <ul style="list-style-type: none"> • Agree the definitions and reporting arrangements required to populate the Standardization Matrix • Deliver to Supervisors the fully populated Standardization Matrix and Narrative. After delivering the matrix and narrative, the FXMD will meet with Supervisors to define an ongoing reporting schedule.

Objective 1: Increasing Standardization

Initiative 2 - Product Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
<p>In conjunction with the IIGC and the COSC, the CMD will continue to maintain the quarterly refresh process to update the inter-CMD baseline set in January 2009. As part of this commitment, we will continue to publish the Commodities Documentation Matrix via ISDA and work with the COSC and LEAP to promote incremental documentation standardization projects.</p>	<p>COSC commits to extend the documentation baseline metrics to track documentation take-up rates for interested participants in a Self-Assessment Template of G14 Members vs. non-G14 Members.</p> <p>A COSC meeting will be held to formalize the process by May 15, 2011.</p> <p>A pilot exercise to support Self Assessment Template to track documentation take up rates will be conducted by June 30, 2011.</p>
Derivatives: Credit <input type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>During the 2011 implementation of the 2011 Equity Definitions, the signatories commit to using the range of menu items as published in the 2010 Equity Definitions to create matrices and MCAs for products agreed by the industry.</p>	<p>The Signatories agree to deliver two transaction matrices by July 31, 2011, focusing on long established and frequently traded products.</p> <p>By October 31, 2011, the Equity Steering Committee commits to providing a plan detailing the products that will be targeted for Matrix Development over the immediately following 3 months, and further commits to deliver similar plans on a quarterly basis.</p>

Objective 1: Increasing Standardization

Initiative 2 - Product Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>Review, update and expand the 2002 Equity Definitions in accordance with the Equity Documentation framework document published on January 30, 2009. The project is multifaceted and includes</p> <ul style="list-style-type: none"> • consolidation, review and updating of the 2002 Equity Definitions and subsequent master confirmation agreement (MCA) publications; • expansion of existing 2002 Equity Definitions coverage to include a wider set of product types, pay offs and underliers; and • introduction of a menu approach to facilitate standardization of contractual terms and product flexibility. 	<p>Commitment Continues with May 31, 2011 delivery date.</p>
<p>Provide verbal updates to the Supervisors on 2011 Equity Definitions progress on a six-weekly basis commencing March 31, 2010.</p>	<p>Commitment Continues</p>

Objective 1: Increasing Standardization

Initiative 2 - Product Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input type="checkbox"/>	
By Dec 31, 2010, the FXMD commit to continue to work with the FMLG and ISDA to standardize templates and terms for the Volatility Swap family of instruments (including all related life-cycle event notices).	Commitment Continues

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
<p>Enhanced monthly reporting to identify interdealer volumes and eligible trades not electronically confirmed.</p> <p>The G14 commit to the two key electronic matching interim targets: Beginning January 2010 month-end data for energy trades between the G14, 90% of the electronically eligible population will be confirmed electronically.</p> <p>Beginning April 2010 month-end data for metals trades between the G14, 85% of the electronically eligible population will be confirmed electronically.</p> <p>The CMD will continue to partner with the ISDA Commodities Product Steering Committee (COSC) to drive G14 and non-G14 communication and coordination on specific initiatives where appropriate. The CMD will also work with COSC leadership and Sapient to share CMD metrics template and definitions with the non-G14 market participants.</p>	<p><i>Commitment 1: Increase the OTC Community Derivatives Metrics Participation</i></p> <p>To provide Supervisors with additional OTC Commodity Derivative market data, the COSC, leveraging the existing CMD metrics process, commit to increase the OTC Commodity Derivatives metrics participation through a broader set of non-G14 Members, non-Signatories and members of the COSC through 2011. The COSC commit to set-up a working group to discuss the metrics process and pilot an initial COSC related metrics process for interested participants by June 30, 2011.</p> <p>The CMD commit to defining new targets for electronic confirmation matching, of energy and metals by June 30, 2011.</p> <p>CMD further commit to analyze the individual CMD data in an effort to move to firm-specific targets.</p>

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
<p>In conjunction with the IIGC and COSC, the CMD will continue to develop updated electronic processing models for all trade types, in support of the Matching performance targets below. This commitment relates in part to the Percentage of Electronic Eligible trades that are confirmed electronically. Targets apply to trades between the CMD dealer firms and exclude CMD to non-dealer trades. Targets for energy and metals relate to industry averages and not firm specific benchmarks.</p>	<p>Commitment Continues</p>
<p>On a quarterly basis, the CMD will provide an update on the usage of electronic confirmation platforms within the CMD firms. The updated results will be published to the Supervisors for review and comment.</p>	<p>Commitment Continues</p>
<p>On a quarterly basis, the CMD will publish for the Supervisors a trend analysis and supporting commentary relating to: the size and nature of market activity, number of outstanding confirmations together with aging profiles, and the degree of automation within the confirmation process.</p>	<p>Commitment Continues</p>

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
No Commitment	<p>Commitment 2: Automate Recovery Lock Transactions</p> <p>The CIG commits to working with service providers to successfully release electronic confirmations, novation, and post trade processing for Recovery Lock Transactions, targeted for roll-out in Q2 2011.</p>
Derivatives: Credit <input type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>80% of Electronically Eligible Confirmations on an electronic platform</p> <p>90% T+1 submission for G14 Members versus all counterparties for Electronically Eligible Confirmations processed on an electronic platform.</p> <p>90% T+5 matching for G14 Members versus all counterparties for Electronically Eligible Confirmations processed on an electronic platform.</p>	<p>Commitment 3: Further Improve Equity Derivative Operational Performance Targets</p> <p>By September 30, 2011, the G14 Members commit to processing 85% of Electronically Eligible Confirmations on an electronic platform.</p> <p>By November 30, 2011, the G14 Members commit to 95% T+1 submission for G14 Members versus all counterparties for Electronically Eligible Confirmations processed on an electronic platform.</p> <p>By November 30, 2011, the G14 Members commit to 95% T+4 matching for G14 Members versus all counterparties for Electronically Eligible Confirmations processed on an electronic platform.</p> <p>In January 2012 the G14 Members will review the state of progress on the matching infrastructure and outline a plan for moving to T+3.</p> <p>In addition the G14 Members will provide quarterly updates on their progress regarding development of confirmation processing infrastructure commencing September 30, 2011.</p>
Target to electronically process 80% of interdealer eligible Discrete TRS.	Commitment Continues

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Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
Target to electronically process 50% of electronically eligible Dealer-to-Client Discrete TRS transactions.	Commitment Continues
The OSC commit to an industry target of 40% of total equity derivative transaction volume that is defined as electronically eligible.	Commitment Continues
By June 30, 2010 70% T+1 submission and 75% T+5 matching of Discrete TRS between G14 dealers for Electronically Eligible Confirmations processed on an electronic platform.	Commitment Continues
By June 30, 2010 commitment that outstanding confirmations aged more than 30 calendar days are not to exceed 1 business day of trading volume based on average daily volume in the prior three months.	Commitment Continues

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>By September 30, 2009, target architecture for lifecycle event processing will be defined. By December 31, 2009, discussions will be held with potential service providers following which a decision will be made whether or not to proceed with implementation of a solution in 2010.</p>	<p>Platform Convergence and Lifecycle Event Processing: The signatories will continue to work with vendors to develop the phases and specific milestones and commit to providing a detailed implementation plan with key milestones by June 30, 2011. Phases are highlighted as follows:</p> <ul style="list-style-type: none"> a) Electronic confirmation processing platforms to build links with trade repositories to exchange all matched economic fields and automate processing of trade life cycle events for Option transactions – phased implementation per Option category (i.e. Index, Single Stock, Variance.) b) Enhance electronic confirmation platforms to support Equity Swap products for both full confirmation and trade life cycle event processing and ensure links with Trade Repositories remain viable. c) Identify and build processing mechanisms to support automated delivery of paper confirmed population trade economics to trade repositories.
<p>No Commitment</p>	<p>ESC commits to publish a set of rules to support the creation of an Equity Determinations Committee structure ("EDC") for market disruption event determinations for variance swaps with supporting ISDA publications (Matrix or MCA) by March 31, 2012.</p> <p>The EDC structure will be implemented 90 days after publication of the rules.</p> <p>ESC agrees to provide the supervisors with quarterly updates starting at June 30, 2011 on the status of publishing the EDC rules, prior to the March 31, 2012 publication date.</p>

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>60% of electronically eligible confirmable events with all other participants will be processed on electronic platforms.</p> <p>Major Dealers commit to confirming all electronically eligible events on an electronic platform within 90 days for both Dealers and Buy-Side who are trading more than 20 eligible trades/month based on three-month average and will report participants who have not met this criteria to Supervisors.</p> <p>Upon adoption of MarkitSERV interoperability Submit 90% of electronic confirmations no later than T+0 business days.</p> <p>Upon adoption of MarkitSERV interoperability Match 97% of electronic confirmations no later than T+2 business days.</p> <p>Review and re-evaluate interoperability submission and matching targets with Supervisors on a quarterly basis to get to a steady state and progress toward T+0 submission and matching.</p>	<p>Commitment 4: Further Improve Interest Rate Derivative Operational Performance Targets</p> <p>By September 30, 2011, 75% of electronically eligible confirmable events with all other participants will be processed on electronic platforms.</p> <p>The Signatories commit to confirming all electronically eligible events within 90 days of the functionality being available on the middleware platforms utilized where they are trading more than 5 eligible trades/month based on three-month average and beginning in June 2011, and will report participants who have not met this criteria to Supervisors.</p> <p>By June 30, 2011, submit 95% of electronic confirmations between G14 Members on Trade Date.</p> <p>By June 30, 2011, submit 80% of electronic confirmation with other clients on Trade Date.</p> <p>By June 30, 2011, match 98% of electronic confirmations between G14 Members by T+2.</p> <p>By June 30, 2011, match 90% of electronic confirmations with other clients by T+2.</p>

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
95% of electronically eligible confirmable events with G14 Members are processed on electronic platforms.	Commitment Continues
Upon delivery of an interoperable confirmation process between existing legal confirmation platforms, commitment to use this functionality for eligible products within 90 days of its release.	Commitment Continues
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
Use of RED for 90% of single name.	Commitment Continues
90% target for T+0 submission for all electronically eligible transactions.	Commitment Continues
94% T+2 matching for all electronically eligible trades by December 31, 2009.	Commitment Continues

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
94% confirmations without modification for all trade types, including novations by June 30, 2009.	Commitment Continues
Supply of accurate allocation details on trade date via submission to an electronic affirmation or confirmation platform.	Commitment Continues
OSC dealers will continue to submit as part of their monthly reporting to supervisors (i) the number of electronically eligible trades outstanding over 30 days and (ii) the number of non-electronically eligible trades outstanding over 30 days.	Commitment Continues
The credit derivatives industry continues to positively affirm the economic details of unconfirmed paper trades by T+3 and unconfirmed electronically eligible trades by T+5.	Commitment Continues

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input type="checkbox"/>	
Ongoing commitment to standardize paper contracts and create more robust best practices around manual processing of complex exotics.	Commitment Continues
By December 31, 2010, Major Dealers commit to working with the Emerging Markets Traders Association (EMTA) to agree on specific data sources, combination of data sources or development/implementation of new data sources in order to increase the number of standardized non-deliverable currency pairs.	Commitment Continues
By December 31, 2010, each dealer of the FXMD commit to (i) 95% target (by and among each other) for electronic processing of Vanilla Options eligible volume. (ii) 95% target (by and among each other) for electronic processing of Vanilla Options eligible volume.	Commitment Continues

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input type="checkbox"/>	
<p>By December 31, 2010, the FXMD commit to the establishment of an FX Novation Protocol. Since the events of 2008, the FX Market has seen a slight increase in novations.18 Recognizing its value to the interest rate and credit derivatives market since 2005, the FX Market will put a similar process in place to allow for the more effective and efficient booking and processing of novations.</p>	<p>Commitment Continues</p>
<p>By Dec 31, 2010, the FXMD commit to further analysis on the risk management benefits of additional life-cycle event processing for Simple Exotic Options.</p>	<p>Commitment Continues</p>
<p>By December 31, 2011, each dealer in the FXMD commit to (i) 90% target for electronic processing of NDOs eligible volume; (ii) 50% target of electronically processing for eligible barrier volume.</p>	<p>Commitment Continues</p>
<p>Ongoing commitment to increase central settlement.</p>	<p>Commitment Continues</p>

Objective 1: Increasing Standardization

Initiative 3 - Process Standardization

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input type="checkbox"/>	
By December 31, 2010, the FXMD commit to working with supporting buy-side institutions to (i) further develop new solutions or enhancing current service provider offerings, and (ii) set new commitments appropriate for those discrete counterparty types.	Commitment Continues

Objective 2: Expanding Central Clearing

Initiative 1 - Expand central clearing in currently eligible transactions

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
No Commitment	<p><i>Commitment 1: Provide supervisors with individual firm plans for meeting central clearing requirements</i></p> <p>The G14 Members commit to share their current state of planning for complying with statutory clearing requirements by April 30, 2011 and then on a regular basis with their primary Supervisors, outlining steps, milestones, and potential contingencies and solutions to achieving the requirements.</p>
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
Each G14 member (individually) reaffirms the September 8, 2009 commitment to submit 95% of new Eligible Trades for clearing. Each G14 member will work with Supervisors to assess its performance against this target by March 31, 2010.	Commitment Continues
Increase commitment to clearing from 80% of new and historical Eligible Trades to 85%.	Commitment Continues

Objective 2: Expanding Central Clearing

Initiative 1 - Expand central clearing in currently eligible transactions

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
Each G14 Member (individually) commits to submitting 92% of new Eligible Trades (calculated on a notional basis) for clearing.	<p>Commitment 2: Performance Targets for the Submission and Clearing of Eligible Trades</p> Each G14 Member (individually) commits to an enhanced submission rate of 95% of new Eligible Trades for clearing (calculated on the basis of previously agreed methodology) for clearing by June 30, 2011 .
The G14 Members (collectively) commit to clear 90% of new Eligible Trades (calculated on weighted average notional basis).	The G14 Members (collectively) commit to continued clearing of 92% of new Eligible Trades (calculated on the basis of a group target) by June 30, 2011 .
The G14 clearing members (collectively) commit to clearing 75% of historical eligible trades (calculated on a weighted average notional basis) by June 30, 2010.	Commitment Continues

Objective 2: Expanding Central Clearing

Initiative 2 - Increase transparency in processes related to the expansion of central clearing offerings

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>This commitment replaces a series of commitments in the March 2010 FED Letter aimed at expanding the product coverage at CCPs.</p> <p>Develop a plan for the next phase of CCP product expansion.</p>	<p>Commitment 1: Work with central clearing platforms to provide information to Supervisors on methodologies for evaluating candidate products for expanded central clearing offerings and information on the evaluation of products under review</p> <p>Signatories commit to initiating discussions with relevant CCPs to assess the suitability for clearing new credit and interest rate derivative products, prioritizing these products for analysis commensurate with their level of risk by Q3 2011.</p> <p>Signatories will provide support to the CCPs in their efforts to:</p> <p>a) Provide enhanced transparency to Supervisors into the process by which new products/features/underliers are assessed for clearing feasibility. Deliverables for CCPs will be completed to a schedule to be agreed amongst Signatories, relevant CCPs and Supervisors. CCPs will be encouraged to deliver:</p> <p>i. Documentation explaining the CCP's policies and procedures to assess clearing eligibility;</p> <p>ii. Case study examples of products which have previously been assessed; and</p> <p>iii. Representatives to meet with Signatories and Supervisors to discuss such processes in a continuous, collaborative process among participants, CCPs and Supervisors.</p> <p>Signatories commit to support the CCPs in their efforts to maintain a Product Pipeline tracking the status of potential future products/features/underliers for regular review and discussion with the global Supervisors.</p>
<p>G14 members commit to deliver on a monthly basis a list of recommended launch targets for new products in order of priority.</p> <p>Develop a plan for the next phase of CCP product expansion.</p>	<p>Commitment 2: Provide regularly updated plans and timeframes for roll-out of products and features for central clearing platforms</p> <p>Signatories commit to working with CCPs to prioritize the following products/features onto one or more credit derivatives CCP:</p> <ul style="list-style-type: none"> - Commencement of single name Sovereigns, additional single names, additional indices <p>Signatories commit to work with CCPs to prioritize the following products/features onto one or more interest rates CCPs:</p> <ul style="list-style-type: none"> -FRAs, amortizing swaps, 3 new currencies (HUF, CZK and SGD) <p>The following products have been identified as sufficiently active in the marketplace to merit assessment for clearing potential. Signatories commit to work with the CCPs to evaluate suitability for clearing:</p> <ul style="list-style-type: none"> - cross-currency swaps, caps/floors, European swaptions, inflation swaps

Objective 2: Expanding Central Clearing

Initiative 2 - Increase transparency in processes related to the expansion of central clearing offerings

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>The signatories have asked the Depository Trust & Clearing Corporation (DTCC) to perform an analysis of all CDS trades in the Warehouse Trust which are on products not yet eligible for clearing.</p>	<p>Commitment 3: Work with trade data repositories to provide notional and trade count reporting for credit and interest rate derivatives transactions in products that are supported on central clearing platforms but are not “Eligible Transactions” for the purposes of performance targets in submission and clearing.</p> <p>Signatories will work with the Supervisors and DTCC to create the appropriate reports that extract the needed information (notional and trade count reporting for credit derivative transactions in products supported on a central platform but not “eligible” for purpose of performance targets), from the Trade Information Warehouse. These reports will enable the Supervisors to extract this information on an on-going basis. DTCC will deliver the initial report by June 30, 2011.</p>
<p>Work with Supervisors to deliver a set of performance targets for CCP usage.</p>	<p>Signatories commit to add additional reporting to the monthly notional report provided to the regulators to identify trades that are eligible based on product, but where clients are not live on a CCP. This additional reporting will commence month ending June 30, 2011.</p>

Objective 2: Expanding Central Clearing

Initiative 3 - Key issues and challenges pertaining to access to CCPs

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>The dealer signatories commit to deliver on a bi-weekly basis a current list of open items categorized by importance and priority, the action plan, responsible parties and target date for completion of all critical items and the current targets for launching new products and (b) the end-user signatories have delivered and commit to deliver a substantially similar document to each relevant CCP on a monthly basis. The signatories will encourage each relevant CCP to provide these lists together with their perspectives to the Supervisors expeditiously. In addition, signatories will commit to work with each relevant CCP to arrive at a unified list of open items, and to encourage each relevant CCP to provide such lists to the Supervisors on an ongoing basis.</p>	<p>The Signatories commit to participating with the Supervisors and the relevant central clearing platforms in a series of focused discussions on the key issues/obstacles to expansion of central clearing. Through the discussion process, the Signatories commit to working with the Supervisors to establish appropriate milestones for resolution of the issues discussed.</p> <p>The Signatories commit to establishing a draft prioritized schedule (including proposed sets of participants) of discussions separately for both indirect and direct access to Supervisors by April 30, 2011.</p> <p>The Signatories commit to work with CCPs to develop membership criteria which supports open access for market participants on objective, non-discriminatory, risk-based principles, to support the implementation of G-20 clearing commitments.</p>

Objective 2: Expanding Central Clearing

Initiative 4 - Advance the discussion concerning CCP involvement in ISDA Credit Derivatives Determinations Committees

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>The signatories commit, from time to time upon the request of the CCPs, to ask the DCs, in consultation with regulators, to re-evaluate the CCPs' observer status to determine the appropriate membership role of CCPs.</p>	<p>Commitment 1: By June 30, 2011, to make the necessary amendments to the DC Rules to permit observer status for CCPs that meet certain de minimis threshold conditions.</p> <p>Signatories commit to make the necessary amendments to the DC Rules to permit observer status for CCPs that meet certain de minimis threshold conditions.</p> <p>Commitment 2: To review the CCPs' status at a later date if requested by CCPs and subject to agreeing qualification standards and safeguards for the current voting structure, which has been demonstrated to work.</p> <p>Signatories commit to review the CCPs' status at a later date if requested by CCPs and subject to agreeing qualification standards and safeguards for the current voting structure, which has been demonstrated to work.</p>

Objective 3: Enhancing Bilateral Risk Management

Initiative 1 - Dispute Resolution

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>Analyze existing, and where appropriate, potential opportunities for further standardization and a standardization matrix will be completed in partnership with the Supervisors.</p>	<p><i>Commitment 1: Publish and develop ISDA Dispute Resolution Documentation</i></p> <p>Signatories commit to publishing a revised draft of the ISDA 2011 Convention on Portfolio Reconciliation and the Investigation of Disputed Margin Calls (the "Convention") by April 7, 2011.</p> <p>Signatories commit to publishing a revised draft of the ISDA 2011 Formal Market Polling Procedure (the "MPP", together the "ISDA Dispute Resolution Documents") by April 26, 2011.</p> <p>Signatories commit to trial the Convention and MPP for a three month period beginning May 4, 2011 and ending July 29, 2011 between G14 Members and other interested market participants on a bilateral basis.</p> <p>Signatories commit to publish a revised draft of the ISDA Dispute Resolution Documents reflecting lessons learned in the trial period along with a phased implementation plan for industry adoption by September 9, 2011.</p>
<p>Complete additional testing and further refinement of the DRP - regular updates to the Supervisors will be provided.</p>	<p>Commitment Continues</p>

Objective 3: Enhancing Bilateral Risk Management

Initiative 1 - Dispute Resolution

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>Implementation of the new risk-based threshold which replaces the \$20mm level for reporting valuation differences to the regulators.</p> <p>Pro forma template for disputed collateral and exposure amounts reporting to be provided to Supervisors.</p> <p>Report disputed collateral and Exposure amounts – consistent reporting to supervisors to be developed.</p>	<p>Commitment 2: Enhance Reporting of Disputes</p> <p>Effective March 31, 2011 (reporting in April 2011), Signatories commit to amend the threshold of dispute reporting from disputes over \$20mm and 15 days to disputes over \$15mm and 15 days.</p> <p>On a monthly basis, the G14 Members will report on the number of disputes that are taken through a polling process during the previous month.</p> <p>70% of G14 Member firms will implement these enhancements by May 31, 2011 and the remainder no later than December 30, 2011. Firms that cannot meet the May 31 date will inform their prudential regulator.</p> <p>Signatories further commit to investigate the feasibility of achieving the supervisory goal of a consolidated, anonymised report of large disputes across industry participants, and to report back to the Supervisors by June 30, 2011.</p>

Initiative 2 - Portfolio Reconciliation

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>Signatory firms will undertake reconciliation (bilateral where possible and otherwise unilateral) of collateralized portfolios with any OTC counterparty comprising more than 1,000 trades at least monthly by June 30, 2010.</p>	<p>Commitment 1: Reduce thresholds for routine portfolio reconciliation</p> <p>Signatories commit to reduce the threshold for routine portfolio reconciliation of collateralized portfolios from those exceeding 1,000 transactions to those exceeding 500 transactions starting June 30, 2011.</p>

Objective 3: Enhancing Bilateral Risk Management

Initiative 2 - Portfolio Reconciliation

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
The CMD will partner with collateral portfolio reconciliation vendors to improve matching rates.	Commitment Continues

Initiative 3 - Update the Industry and Collateral Roadmap and Best Practice Documents

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>Signatories commit to update the Roadmap for Collateral Management by April 15, 2010 based on the recommendations from the Independent Amount white paper (March 1, 2010) and the Market Review of Collateralization (March 1, 2010).</p> <p>Signatories commit to publish a "Best Practices" document for Collateral management.</p>	<p><i>Commitment 1: Collateral Roadmap and Best Practice Documents</i></p> <p>Signatories commit to update the Collateral Roadmap by June 30, 2011.</p> <p>Signatories commit to update the Collateral Best Practice Document by November 30, 2011.</p>

Objective 3: Enhancing Bilateral Risk Management

Initiative 3 - Update the Industry and Collateral Roadmap and Best Practice Documents

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
<p>The CMD continue to support the cross asset class commitments outlined by the ISDA Collateral Committee. In particular, as committed to in the Collateral Roadmap, the CMD signatories to this letter perform daily electronic portfolio reconciliation of all collateralized OTC inter-CMD derivative transactions, including OTC Commodity Derivative transactions. In addition to the daily inter-CMD reconciliations, we commit to utilize the ISDA 2009 Dispute Resolution Procedure as it applies to OTC Commodity Derivatives transactions.</p>	<p>Commitment Continues</p>

Objective 3: Enhancing Bilateral Risk Management

Initiative 4 - Portfolio Compression

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
No Commitment	<p>Commitment 3: Portfolio Compression for Interest Rate Derivatives</p> <p>The G14 Members commit to executing regular compression cycles for both bilateral and cleared transactions. There will be at least 12 bilateral compressions and 6 cleared trade compressions in a major Rates CCP in appropriate currencies in the 12 months ending March 2012, and over time the number of bilateral cycles will decrease and cleared cycles increase dynamically in line with the outstanding population available for compression.</p> <p>The G14 Members commit to optimizing the concentration of their exposures and the submission of their portfolios on an ongoing basis in order to maximize the success of the tear-up algorithms.</p> <p>Signatories will work with the major Rates CCP to seek to deliver the following enhancements:</p> <ul style="list-style-type: none"> - creating a workflow for compression of non-London based currencies such as JPY; - including FRAs into the scope of cleared products being compressed once the product is added to the clearing product scope; and - implement riskless (same trade economics) compression within the US FCM cleared trade framework.
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
Major Dealers will continue trade compression such that there are compression cycles of 15-20 Reference Entities per week in each of the US and Europe, and monthly compression cycles of index trades.	<p>Commitment 4: Portfolio Compression for Credit Derivatives</p> <p>The G14 Members commit to continue to perform compression cycles, as needed, specifically where there is a resulting yield achieved through the process. The Signatories will work with the Supervisors to establish appropriate frequencies for compression runs that aim to maximize aggregate compression yields on a risk neutral basis. The Signatories commit to work with CCPs to introduce compression as a standard part of their functionality.</p>

Objective 4: Increasing Transparency

Initiative 1 - Develop, Implement, and Enhance Trade Repository Infrastructure

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
No Commitment	<p><i>Commitment 1: Participate in Efforts to Develop and Use International Data Standards</i></p> <p>Signatories commit to deliver a whitepaper by April 15, 2011 on the topic of standardized representation and unique product identifiers for OTC derivatives.</p> <p>Signatories commit to deliver a plan for the development of standardized representations and unique product identifiers, as outlined above, to the regulators by May 15, 2011.</p>
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>The global Interest Rate Reporting Repository (IRRR) was launched on December 31, 2009, and the G14 Members are now providing monthly reporting from this global data repository on outstanding non-cleared trades to primary regulators. Since initial launch, enhancements have been made to normalize submissions between dealers, and we will continue to work with regulators and the legal community to expand and enhance this reporting process.</p>	<p><i>Commitment 2: Interest Rate Derivatives Trade Reporting Repository (“IRRR”) Design Changes</i></p> <p>By June 30, 2011, the Signatories will deliver a full plan for implementation of the next phase of the IRRR. This plan will identify detailed deliverables relating to data, messaging and infrastructure of the IRRR.</p> <p>The indicative target go live for the next phase of the IRRR is Q4 2011, Signatories will work with the service provider selected through the RFP process, to keep the Supervisors informed of progress towards meeting this target. Formal updates will be provided following delivery of the implementation plan by June 30, 2011.</p>

Objective 4: Increasing Transparency

Initiative 1 - Develop, Implement, and Enhance Trade Repository Infrastructure

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
<p>By July 31, 2010 the OSC commits to implement a centralized reporting infrastructure for all OTC equity derivatives products. This infrastructure will include (i) summary trade details and (ii) a structure to report the information centrally. In the interim, by September 30, 2009 the OSC dealers commit to report, on a quarterly basis: the total notional size by product type of the OTC equity derivative portfolio with: (i) other OSC dealers, and (ii) all other market participants.</p> <p>March 2010: The ESC will work with the Supervisors to implement a reporting process that is both practical and meets regulatory expectations in regard to the agreed information held in the Equity Derivatives Reporting Repository.</p>	<p>Commitment 3: Equity Derivatives Trade Repository Design Changes</p> <p>Signatories commit to continue working with the Supervisors and other appropriate global authorities to improve and enhance an appropriate Trade Repository infrastructure for the OTC Equity Derivative markets. Signatories will keep the Supervisors informed of progress towards meeting these targets and formal updates will be provided following delivery of the implementation plan by June 30, 2011. The implementation plan will include a detailed timeline and at a minimum, description for the following deliverables:</p> <ul style="list-style-type: none"> a) Migration from position to transaction level data submission; b) Increase in reporting frequency; c) Additional transaction level data fields; d) Introduction of a trade pairing process; and e) Process for onboarding participants in order for data to be representative of the overall market.
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
<p>No Commitment</p>	<p>Commitment 4: Commodity Derivatives Trade Repository Plans</p> <p>In an effort to further Supervisory transparency, the COSC commits to conduct a similar survey to the one completed in 2010, which will cover financial agricultural products, by December 31, 2011.</p>

Objective 4: Increasing Transparency

Initiative 1 - Develop, Implement, and Enhance Trade Repository Infrastructure

Prior Commitment	March 2011 Letter
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
The CMD will partner with the ISDA Commodity Products Steering Committee to build consensus and support for a Trade Repository in Commodities among both dealers and non-dealers. The goal is to develop a Request for Proposals (RFP) by the third quarter of 2010.	Commitment Continues. The COSC developed and issued the RFP for a Commodity Derivatives Trade Repository on March 25, 2011. The COSC commits to select a service provider by May 31, 2011 and go live with the repository by the end of Q1 2012.
Derivatives: Credit <input type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input type="checkbox"/>	
FX Market Participants are committed to a continued dialogue relating to market transparency with their relevant regulators until an approach can be properly assessed.	<p>Commitment 5: Foreign Exchange Derivatives Trade Repository Plans</p> The FXMD will embark on a full RFP process to identify the most suitable vendor to develop a FX Derivatives Trade Repository no later than Q2 2012 .
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input type="checkbox"/> Interest Rates <input type="checkbox"/> FX <input type="checkbox"/> Commodities <input type="checkbox"/>	
No Commitment	<p>Commitment 6: Credit Derivatives Trade Repository Enhancements</p> Work is taking place to assess the feasibility of trade repositories holding electronic images of legal confirmation documents for all non-electronically confirmed trades (verified with both parties to the transaction). It is contemplated that this data will provide a higher quality of information to the regulators than the current Copper record. Additionally, the Warehouse Trust has launched a portal that makes available standard reporting for gold records to relevant Supervisors. This environment can be expanded to include automated distribution of copper reporting to relevant regulators in Q2 2011.

Objective 4: Increasing Transparency

Initiative 2 - Addressing client data confidentiality in connection with transaction data reporting

Prior Commitment	March 2011 Letter
Derivatives: Credit <input checked="" type="checkbox"/> Equity <input checked="" type="checkbox"/> Interest Rates <input checked="" type="checkbox"/> FX <input checked="" type="checkbox"/> Commodities <input checked="" type="checkbox"/>	
No Commitment	<i>Commitment 1: Signatories will work towards proposals for designing systems for client identification numbers across trade repositories.</i>
No Commitment	<i>Commitment 2: Signatories will work with Supervisors towards promoting statutory and regulatory changes aimed at enabling the disclosure of transaction data for legitimate supervisory and regulatory use, based upon clear specification of regulatory entitlements and permissioning.</i>
No Commitment	<i>Commitment 3: Once the necessary safeguards for the client data have been clarified, the Signatories will propose means for promoting and effecting the voluntary disclosure of client transaction data.</i>