



FEDERAL RESERVE BANK of NEW YORK

FFIEC 009 Reporting Seminar

Wednesday, June 8, 2016



Overview of 009 Reporting

Rob Braccia

Summary Description

The FFIEC 009 consists of four schedules:

Schedule	Type of Data Collected
Schedule C, Part I	Claims on an immediate-counterparty basis and redistribution of immediate-counterparty claims to an ultimate-risk basis
Schedule C, Part II	Claims on an ultimate-risk basis and memorandum items providing additional details related to those claims.
Schedule L	Foreign-office liabilities
Schedule O	Off-balance sheet exposures
Schedule D	Fair value of derivative contracts



General Instructions

Who Has to File?

Type of Entity
Banks
Savings Associations
Bank Holding Companies
Savings and Loan Holding Companies
Intermediate Holding Companies (new)



IHC: Intermediate Holding Company

Beginning **July 1, 2016**, under Regulation YY, *Foreign Banking Organizations (FBOs) with non-branch U.S. assets exceeding \$50 billion as of June 2015* are required to:

1. Form an Intermediate Holding Company (IHC) over their U.S. non-branch subsidiaries.
2. Meet the same capital and liquidity standards applicable to U.S. bank holding companies.
3. Hold liquidity in the U.S. sufficient to cover a 14 day stress scenario. IHC will require a certain amount of assets to be dedicated to cover exposures within the U.S. branch.
4. Be subject to the Dodd-Frank Act.
5. Undergo periodic stress testing.

As a result, IHCs will be subject to the same regulatory reporting requirements as Bank Holding Companies, including the requirements of the FFIEC 009 and 009a reports, beginning with the September 30, 2016 as-of-date.



General Instructions – Reporting Thresholds

Any U.S. chartered insured **bank** or **savings association**, that has, on a fully consolidated basis, total outstanding claims on foreign residents exceeding \$30 million in the aggregate, **and** has at least one of the following:

- A branch in a foreign country;
- A consolidated subsidiary in a foreign country;
- An Edge or Agreement Subsidiary;
- International Banking Facility (IBF); or
- A branch in Puerto Rico or in any U.S. territory or possession (except that a bank or savings association with its head office in Puerto Rico or any U.S. territory or possession need not report if it meets only this criterion);



General Instructions – Reporting Thresholds

- **Bank holding companies** that are required to file the FR Y-6 (BHC Annual) and has a subsidiary bank required to report.
- Every **savings and loan holding company** and **intermediate holding company** that meets the above criteria for banks.
- **Edge and/or Agreement corporations** that have total outstanding claims on residents of foreign countries exceeding \$30 million, unless it is majority owned by a bank, bank holding company, savings association, savings and loan holding company, or intermediate holding company required to file a report.



General Instructions – Reporting Thresholds

Institutions meeting the Schedule D requirements:

- Excess of \$10 billion in total gross notional value of derivative contracts
OR
- Total gross fair values of derivative contracts greater than 5% of total assets
- **NOTE:** If your institution doesn't meet any of the other requirements listed on the previous slides, but meet the Schedule D requirement, it must file all schedules on the report.



General Instructions – Reporting Thresholds

Schedule L, Column 3 requirements:

- Reporters that have one or more branches or subsidiaries located outside the fifty states of the United States, the District of Columbia, or a U.S. military facility (regardless of where located) that meet the following criteria:
 - Branch filing FFIEC 030 that has total assets of \$500 million or more (denominated in all currencies) on Line Item 11
 - OR
 - Subsidiaries filing the FR 2314 that has a banking charter and engage in banking business, and that report \$2 billion or more in total assets in Schedule BS, item 10, and \$10 million or more in total deposits in Schedule BS-M, item 6.
- If any foreign office of a reporter exceeds the reporting threshold, then Column 3 should be completed for the reporter's entire organization (not just the office exceeding the threshold).



General Instructions – Reporting Thresholds

Reporting Burden Option

BHC has one subsidiary bank that meets reporting requirements and the bank accounts for 90% or more of total consolidated claims on foreigners

BHC has two or more subsidiary banks that together account for 90% or more of total claims on foreigners

Only subsidiary bank or BHC must file

Each bank subsidiary must file, but BHC need not file



General Instructions - Submission of Reports

- Quarterly
 - Data is to be prepared as of the last calendar day of March, June, September, and December
 - Submission deadline is 45 calendar days after March, June, and September dates, and 50 calendar days after December
 - If submission deadline falls on a weekend or holiday, the deadline defaults to the next business day
- Electronic submission
 - Using the Federal Reserve's Reporting Central system
- Each reporter should keep a copy of each report, which should be signed and certified by an Executive Officer, as defined in Regulation 12 CFR 215.2(e)(1).
 - Per the regulation, an Executive Officer is a person who participates or has authority to participate in major policymaking functions of the company or bank.



General Instructions - Consolidation Rules

Entity Type	Consolidation Rule
Bank Holding Companies	Consolidate subs on the same basis as is done for annual reports to the SEC or as described in generally accepted accounting principles (GAAP). Same rules as FR Y-9C.
Banks	All majority owned subs shall be consolidated unless either the sub is not "significant" or control of the subsidiary does not rest with the reporting bank. Same rules as the FFIEC 031.
Edge and/or Agreement Corporations	Consolidate all branches and underlying subs. Same rules as the FR 2886b.



General Instructions - Accounting Treatment

- All amounts should be reported in U.S. Dollars
 - Currency translations should be made on the same basis as the FFIEC 031 and the FR Y-9C
- Claims, liabilities, and unused commitments should use the same accounting basis as the FFIEC 031 and the FR Y-9C
- Edge and/or Agreement corporations should follow the same accounting principals as the FFIEC 031
- Round all amounts to the nearest million
- Negative amounts are only permissible in Column 4 of Schedule L



General Instructions – Accounting Treatment

Differences between FFIEC 009 reporting and U.S. GAAP

The Netting Of	U.S. GAAP	FFIEC 009
Derivative Contracts	Offsetting of Positive and Negative Fair Values permitted	Offsetting permitted, but Report only Net Positive Fair Values
Trading Assets	Although there is no official FASB pronouncement, it is industry practice to net trading assets against trading liabilities in the same security (i.e., with the same CUSIP or ISIN)	Netting allowed; in addition, short positions in the same issuer and asset class may be reported as an offsetting position on Schedule C, Part II, Column 18.



General Instructions

- Legal Entity Identifier (LEI) **(new)**
 - Beginning September 30, 2016, reporting institutions are required to provide their LEI on the cover page of the FFIEC 009 and 009a reports, **only if an institution already has an LEI.**
 - Institutions that do not have an LEI are not required to obtain one for purposes of reporting it on the FFIEC 009 and 009a.
 - 20-character, alpha-numeric code used to uniquely identify legally distinct entities that engage in financial transactions.



Country Allocations

- For the purposes of the FFIEC 009 report, “location” is based on where an institution is legally established.
 - Corporation/SPE – country of incorporation
 - Bank – country of charter
 - Bank Branch – country of license
 - Individual – country of citizenship
- All countries, including U.S., are listed on the report form.
 - The U.S. includes Puerto Rico, American Samoa, Guam, Johnston Atoll, Kingman Reef, Midway Islands, the U.S. Virgin Islands, Wake Islands, and the International Banking Facilities of U.S. entities.
 - There are “unallocated” lines for liabilities and credit derivatives, but they may only be used in certain circumstances.



Country Allocations

- International and Regional Organizations.
 - Broken out by region
 - Some organizations may be considered “International”
 - These organizations, are by definition, considered “Public”
 - Certain organizations, such as the Bank for International Settlements (BIS), and European Central Bank (ECB), are listed in the body of the form



Cross-Border vs. Local-Office

- Claims are reported based on the location of the obligor, in relation to the location of the creditor.
- **Country of creditor** is based on the entity (e.g. sub or branch of the reporting institution) that enters into the transaction.
- A **cross-border claim** is where the creditor and obligor are located in different countries.
- A **local-office claim** is where the creditor and obligor are located in the same country.
- “Local” vs. “Non-Local” currency



Sector Definitions

Banks

- The definition of banks encompasses all institutions included in “Banks, U.S. and Foreign” in the Report of Condition, including commercial banks, as well as savings banks, savings associations, discount houses, and other similar depository institutions.
- Banks also include banking institutions owned by foreign governments, unless such institutions perform as an important part of their activities, the functions of a treasury, central bank, exchange control office, or stabilization fund, in which case they are treated as “public” institutions.



Sector Definitions

Public

- Public sector institutions include:
 - Central, state, provincial and local governments and their departments, and agencies
 - Treasuries, ministries of finance, central banks, stabilization funds, exchange authorities, and diplomatic establishments
 - Those government owned banks that perform as an important part of their activities, the functions of a treasury, central bank, exchange control office, or stabilization fund
 - International or regional organizations



Sector Definitions

Public (cont.)

- Banking institutions owned by a government that do not function as the central bank and/or bank of issue are excluded from the public sector and are to be reported as “Banks” while state-owned pension, retirement, and insurance funds should be reported as “Non-Bank Financial Institutions.” Other corporations that are owned by a government are to be reported as “Corporate.”
- U.S. government-sponsored agencies (e.g. Federal Home Loan Bank, Fannie Mae, Freddie Mac, etc.), which are not explicitly guaranteed by the full faith and credit of the U.S. government, should be reported under “Banks”, “Non-Bank Financial Institutions”, or “Corporate” depending on the primary activity of the agency.



Sector Definitions

Non-Bank Financial Institutions (NBFIs)

- Businesses and institutions other than “banks” and “public” that are primarily engaged in proprietary investments and/or in the provision of financial services to other organizations and households.
- Examples include:
 - Securities firms
 - Bank holding companies (BHCs)
 - Pension funds
 - Investment banks
 - Private equity companies
 - Hedge funds
 - Insurance firms



Sector Definitions

Corporate

- Any organization, including non-profits, that is principally engaged in producing goods or non-financial services.
- Includes agencies and instrumentalities of governments such as utilities that produce goods or non-financial services that are not strictly governmental in nature.



Sector Definitions

Households

- Report all claims on households, families, and individuals for personal expenditures.
 - Use the same definition of households as the FR Y-9C, Schedule HC-C, line 6, “Loans to individuals for household, family, and other personal expenditures”, but not only the products reported in Line 6.
- Any reportable claims on households should be reported, regardless of the product type (e.g., residential mortgage loans and consumer leases).



Sector Definitions

Other

- Only applicable to Schedule D
- Includes all entities defined as Corporate or Households



Immediate and Ultimate Risk Claims

- **Immediate counterparty** – who the direct claim is against (direct obligor).
 - Regardless of which of the reporting institution's office has the claim and the structure of the counterparty.
 - Broken out by:
 - Counterparty sector
 - Counterparty location relative to reporting institution's office/sub which has claim (i.e. Cross-Border or Local)
 - Currency (i.e. Local or Foreign)
- **Ultimate risk basis** – who the claim would be against in case of default by the immediate counterparty (e.g., entity/individual providing any form of credit protection).



Risk Transfers

- Shifting from immediate to ultimate-risk is through “risk transfers” on Schedule C, Part I.
- Risk transfers required for:
 - Guarantees/insurance contracts
 - Bank branches
 - Qualifying Collateral
 - Purchased Credit Derivatives
- Transfers between the same sector and country (e.g., from one U.K. bank to another U.K. bank) are excluded.



Data Review

- All submissions are reviewed.
- Analysis and Questions
 - Review of immediate and ultimate claims, including transfers.
 - Focus on quarter-to-quarter change, but with understanding of longer historical trends.
 - Requires detailed information on counterparty sector information as well as instrument type.
 - Considerable size and scope within short timeframe.



Schedule C – Part 1 & 2

Mayank Rastogi



Sch C – Claims on an Immediate and Ultimate Risk Basis

Schedule C

Part I: Claims on
Immediate Risk
Basis

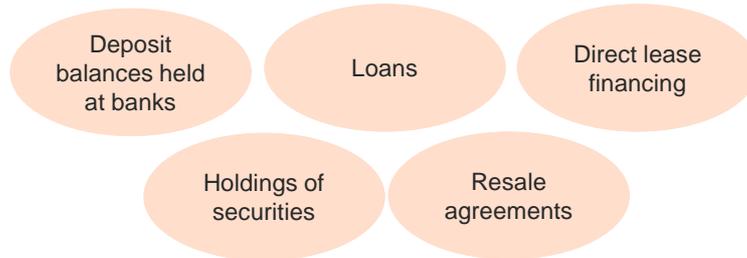
Redistribution
of Claims for
Ultimate Risk

Part II: Claims on
Ultimate Risk Basis



Reportable Claims

- Assets listed in the FFIEC 031 and FR Y-9C instructions.
- Examples of claims (not all inclusive):



- Exclusions:
 - Premises, other real estate owned, goodwill and other intangible assets.



Sch C – Part I: Claims on an Immediate-Counterparty Basis

- Immediate Counterparty – Entity that directly incurred the liability.**

Immediate-Counterparty Basis											
Cross-Border Claims					Claims on Local Residents in Non-Local Currency					Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
C915	C916	M851	M852	M853	C918	C919	M854	M855	M856	C921	C922
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)

- Cross-Border Claims (Columns 1 – 5)**
 - Claims of the reporting institution's offices on entities domiciled outside the country in which the office is located.
 - Broken down by counterparty type.
 - Currency denomination of the claim is not taken into consideration.



Sch C – Part I: Claims on an Immediate-Counterparty Basis

- **Claims on Local Residents - “local” vs. “non-local” currency (Columns 6 – 10, 12)**
 - Claims of the institution’s offices on residents of the country in which the office is located.
 - In “non-local” currency - broken down by counterparty type.
 - In “local” currency - not broken down by counterparty type.
- **Remaining Maturity of One Year or Less – (Column 11)**
 - Claims reported in columns 1 through 10 that have a remaining contractual maturity of one year or less.
 - Definition of one year is consistent with that used in FFIEC 031 and the FR Y-9C.
 - Note:
 - Marketable equity investments both trading and available-for-sale should be reported as maturing in less than one year.
 - Col 11 is an “of which” item, 12 is not.



Sch C – Part 1: Claims on an Immediate-Counterparty Basis – Examples

Example 1 –

The reporter’s London branch has a claim of \$20 million on a non-bank financial institution in Japan. The claims mature in 8 months. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency					Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Japan	42609			20								20	



Sch C – Part 1: Claims on an Immediate-Counterparty Basis – Examples

Example 2 -

The reporter's London branch has loaned \$10 million, denominated in British pounds, to a non-bank financial institution domiciled in London. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
United Kingdom	13005												10	

Example 3 -

The reporter's London branch has loaned \$10 million, denominated in U.S. dollars, to a non-bank financial institution domiciled in London. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
United Kingdom	13005								10					

35

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk

- This section shows the redistribution of claims that are subject to a required risk transfer from the sector and country of the immediate obligor to the sector and country of the ultimate obligor.

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)

- Outward Risk Transfers – (Columns 13 – 17)
 - Reflect the outward transfer of risk from a sector within a country for claims reported on an immediate-counterparty basis that are protected by the purchase of guarantees and/or posting of collateral.
- Inward Risk Transfers - (Columns 18 – 22)
 - Reflect the inward risk transfer by the country and sector of the ultimate obligor. i.e., the guarantor or issuer/holder of collateral.

36

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk

- Risk Transfers include:

Guarantees

Insurance Policies

Collateral

Credit Derivatives

- Note:

- Protection in excess of the amount of the outstanding claim should only be risk-transferred up to the amount of the underlying claim.
- Ownership of shares in a fund or securities issued by a special purpose vehicle are not considered guaranteed by the underlying assets.
- Illiquid assets such as real estate cannot be used for risk transfers.



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk

- Guarantees –

- Legally binding commitments purchased from a third party to protect against default by the direct obligor.
 - Financial and performance standby letters of credit
 - Risk Participations - Loans and acceptances for which the reporting institution has sold a legally binding risk participation are considered guaranteed by the purchaser for the amount of participation sold.

- Insurance Policies –

- Considered guarantees only if they protect against default by the direct obligor. Limited purpose policies such as “political risk” policies are not considered guarantees.



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk

- Collateral –
 - Liquid, and readily realizable, and should be realizable outside the country of residence of the borrower.
 - Eligible Collateral:
 - Cash – guarantor is the entity holding the cash.
 - Securities (debt and equity) – considered guaranteed by the issuer of these securities.
 - Basket of currencies or investment grade securities of different countries – reported on a pro-rata basis opposite the appropriate countries and sectors.



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 4 -

The reporter's Cayman Islands branch has a claim of \$25 million on an insurance company in Switzerland. The insurance company places \$10 million in cash (collateral) with a bank in Switzerland. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis		Immediate-Counterparty Basis											Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency					Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Switzerland	12688			25									

Schedule C, Part I: Claims on an Immediate Risk Basis		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Switzerland	12688			10			10				



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 5 -

The reporter's Cayman Islands branch has a claim of \$25 million on an insurance company in Switzerland, collateralized by \$10 million in German government debt. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year (11)	Claims on Local Residents in Local Currency (12)
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Switzerland	12688			25										

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Switzerland	12688			10							
Germany	11002							10			

41

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 6 -

The reporter's Cayman Islands branch issues a (short-term) margin loan for \$50 million to an insurance company domiciled in Switzerland. The loan is collateralized by \$10 million in Swiss Government debt, \$15 million in German government debt, and \$15 million in debt issued by non-financial corporations in Japan. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year (11)	Claims on Local Residents in Local Currency (12)
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Switzerland	12688			50								50		

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Switzerland	12688			40				10			
Germany	11002							15			
Japan	42609									15	

42

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk

Exceptions – claims backed by eligible collateral, but not subject to risk transfers

- Resale agreements and securities lending arrangements.
 - The claim is reported against the country in which the counterparty is domiciled.
- Memorandum Section of Schedule C, Part II:
 - Has a subsection “Collateral Held Against Claims With No Risk Transfer” that captures information pertaining to the underlying collateral.



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Example

Example 7-

The reporter's Cayman Islands branch enters into an overnight resale agreement involving UK government bonds, for \$50 million with a non-bank financial institution domiciled in the UK. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
United Kingdom	13005			50								50		

Schedule C, Part I: Claims on an Immediate Risk Basis		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
United Kingdom	13005										



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk

Note –

- Guarantees provided by the reporter or other consolidated units are not considered guarantees.
- Claims on a bank branch (but not on a subsidiary), with or without an explicit guarantee, are considered guaranteed by the head office.
- Report the required risk transfers between different countries or between different sectors in the same country. Exclude risk transfers within the same country and sector.



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 8 -

The reporter's U.S. office has a \$30 million claim on a German broker/dealer subsidiary of a UK bank. The claim is protected by a guarantee from the reporter's UK subsidiary. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year (11)	Claims on Local Residents in Local Currency (12)
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Germany	11002			30										

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Germany	11002										
United Kingdom	13005										



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 9 –

The reporter's U.S. office has \$30 million in resale agreements, involving German government debt, with the German branch of a UK bank. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year (11)	Claims on Local Residents in Local Currency (12)
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Germany	11002	30										30		

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Germany	11002	30									
United Kingdom	13005						30				

Note: Risk is transferred out of the German branch in which the branch resides to UK in which the parent resides. There is no risk transfer of the German government debt because this is a resale agreement.

47

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 10 –

The reporter's U.S. office has a \$20 million claim on a Japanese bank. Credit protection is purchased from another bank, also located in Japan. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year (11)	Claims on Local Residents in Local Currency (12)
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Japan	42609	20												

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Japan	42609										

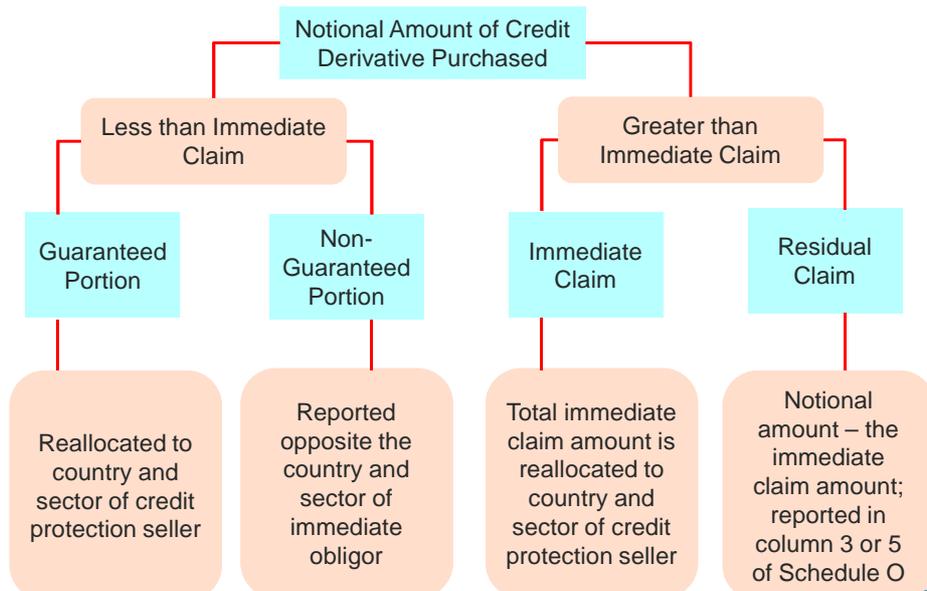
48

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk

- **Credit Derivative Contracts** - purchased are guarantees if the arrangement is considered an effective credit risk mitigant based on its internal criteria and has provisions to pass the credit risk to the counterparty.
- **Minimum Internal Criteria for Credit Derivatives-**
 - Reference same legal entity as the obligor.
 - Specify events that are considered a default.
 - Prohibit clauses that reduce the effectiveness of the guarantee in the case of default.
 - Terms of the credit derivative should provide an effective guarantee even in the case of a maturity mismatch.
- **Multi-name Credit Derivatives** – Only non-tranche index and single name CDS contracts may be used to risk transfer an immediate claim on Schedule C.



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 11 -

The reporter's U.S. office holds \$20 million in bonds issued by a non-financial corporation in France. Credit default swap with a notional value of \$10 million (less than the value of the guaranteed debt) is purchased from a German bank. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis		Immediate-Counterparty Basis										Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency						
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
France	10804				20								

Schedule C, Part I: Claims on an Immediate Risk Basis		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
France	10804				10						
Germany	11002						10				

51

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 12 –

The reporter's U.S. office holds \$20 million in bonds issued by a non-financial corporation in France. A \$30 million CDS contract (greater than the value of the guaranteed debt) on the debt issued by the French non-financial corporation is purchased from a German bank. Entries would be:

Schedule C, Part I: Claims on an Immediate Risk Basis		Immediate-Counterparty Basis										Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency						
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
France	10804				20								

Schedule C, Part I: Claims on an Immediate Risk Basis		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
France	10804				20						
Germany	11002						20				

52

Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 12 (Cont.) –

Schedule O: Off Balance-Sheet Items In Millions of U.S. Dollars		Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Columns 1 through 10 of Part II and Columns 1 and 2 of Schedule O that are Trade Finance
				Gross-Gross		Gross-Net		
		Unused Commitments	Guarantees (Excluding Credit Derivatives Sold)	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)
France	10804			10		10		



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 13 -

The reporter's U.S. office holds \$10 million in UK sovereign debt and purchases a \$50 million CDS contract from a bank in Japan. The underlying is an iTraxx Europe Sovereign index. Assume the CDS is equally weighted between the sovereign debt of the UK, France, Germany, Switzerland and the Netherlands. Entries include:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis										Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency						
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
United Kingdom	13005		10										



Sch C – Part I: Redistribution of Claims to Adjust for Ultimate Risk - Examples

Example 13 (Cont.) –

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
United Kingdom	13005		10								
Japan	42609						10				

Schedule O: Off Balance-Sheet Items In Millions of U.S. Dollars		Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Columns 1 through 10 of Part II and Columns 1 and 2 of Schedule O that are Trade Finance
				Gross-Gross		Gross-Net		
		Unused Commitments	Guarantees (Excluding Credit Derivatives Sold)	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)
France	10804			10		10		
Germany	11002			10		10		
Netherlands	12106			10		10		
Switzerland	12688			10		10		

Sch C – Part II – Claims on an Ultimate-Risk Basis & Memo Items

Comprised of two sections:

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Ultimate-Risk Basis										
		Cross-Border Claims					Claims on Local Residents					
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	Breakdown of Total of Columns 6 through 10 Claims in Non-Local Currency

Breakdown of Total of Columns 1 through 10 Securities (HTM and AFS)		Memorandum						
		Collateral Held Against Claims With No Risk Transfer (Reported in Columns 1 through 10—By Counterparty)				Trading Assets		
		Total Collateral	Of Which, Cash	Of Which, Same Country	Of Which, Resale and Reverse Repurchase Agreements and Securities Lending (Counterparty)	Trading Assets (Reported in Columns 1 through 10)	Offsetting Positions for Trading Book	
M869	M870	M871	M872	M873	M956	M874		
(12)	(13)	(14)	(15)	(16)	(17)	(18)		

- Memorandum section provides additional information related to claims reported on an ultimate risk basis.

Sch C – Part II – Claims on an Ultimate-Risk Basis

Ultimate Obligor – Country of residence of the entity with whom the ultimate risk resides, depending on the type of protection.

Claims on an Ultimate-Risk Basis -

- Cross-border claims
- Claims on local residents

		Ultimate-Risk Basis										Breakdown of Total of Columns 6 through 10
		Cross-Border Claims					Claims on Local Residents					
Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	Claims in Non-Local Currency
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
In Millions of U.S. Dollars												



Sch C – Part II – Claims on an Ultimate-Risk Basis

Cross-border claims – (Columns 1 – 5)

- Claims of the reporting institution's offices on ultimate-obligors domiciled outside the country in which the office is located.
- Broken down by counterparty sector/type.

		Cross-Border Claims					Ulti
U.S. Dollar Amounts in Millions		Banks	Public	NBFIs	Corporate	Households	
FCEX	9151	9207	C929	C930	M863	M864	M865
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	



Sch C – Part II – Claims on an Ultimate-Risk Basis

Claims on local residents - (Columns 6 – 10)

- Claims of the institution's offices on ultimate-obligors that are residents of the country in which the office is located.
- Broken down by counterparty sector/type.

U.S. Dollar Amounts in Millions		Ultimate-Risk Basis										
		Cross-Border Claims					Claims on Local Residents					
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	
FCEX	9151	9207	C929	C930	M863	M864	M865	C932	C933	M866	M867	M868
	Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)

59

Sch C – Part II – Claims on an Ultimate-Risk Basis

Claims on Local Residents in Non-Local Currencies – (Column 11)

- Claims reported in columns 6 through 10 (Schedule C Part II) in currencies other than the official currency of the country in which the office is located.

U.S. Dollar Amounts in Millions		Ultimate-Risk Basis											
		Cross-Border Claims					Claims on Local Residents					Breakdown of Total of Columns 6 through 10 Claims in Non-Local Currency	
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
FCEX	9151	9207	C929	C930	M863	M864	M865	C932	C933	M866	M867	M868	C935
	Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)

60

Sch C – Part II – Claims on an Ultimate-Risk Basis

- **Claims subject to risk transfers –**
 - Guaranteed/collateralized claims
 - Claims on a bank branch (but not on a subsidiary) of a banking organization are considered guaranteed by its head office
- **Claims not subject to risk transfers –**
 - Resale agreements & securities lending arrangements
 - Guarantees provided by entities within the same sector and country as the immediate obligor
 - Guarantees provided by the reporter’s head office or reporter’s other consolidated units
- Risk transfers carried out: Immediate and ultimate obligors are different.
- Risk transfers not carried out: Immediate and ultimate obligors are the same.



Sch C – Part II – Claims on an Ultimate-Risk Basis - Examples

Example 14 -

The reporter’s offices in Japan have a total of \$80 million in claims on residents of Denmark - \$70 million on banks and \$10 million on households. Entries would be:

Schedule C Part I entries:

Schedule C, Part I: Claims on an Immediate Risk Basis		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
Denmark	10502	70				10								

Schedule C, Part I: Claims on an Immediate Risk Basis		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Denmark	10502										



Sch C – Part II – Claims on an Ultimate-Risk Basis - Examples

Example 14 (Cont.) -

Schedule C Part II entries:

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Ultimate-Risk Basis										
		Cross-Border Claims					Claims on Local Residents					Breakdown of Total of Columns 6 through 10
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Denmark	10502	70				10						



Sch C – Part II – Claims on an Ultimate-Risk Basis - Examples

Example 15 -

The reporter's offices in Japan have loaned \$30 million, denominated in dollars, to a bank in Denmark. \$20 million of the claim on the Denmark bank is guaranteed by a bank in Japan. The entries are:

Schedule C Part I entries:

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Immediate-Counterparty Basis											
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency					Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households		
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Denmark	10502	30											

Schedule C, Part I: Claims on an Immediate Risk Basis In Millions of U.S. Dollars		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
Denmark	10502	20									
Japan	42609						20				



Sch C – Part II – Claims on an Ultimate-Risk Basis - Examples

Example 15 (Cont.) -

Schedule C Part II entries:

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Ultimate-Risk Basis										Breakdown of Total of Columns 6 through 10 Claims in Non-Local Currency
		Cross-Border Claims					Claims on Local Residents					
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Denmark	10502	10										
Japan	42609					20						20



Sch C – Part II – Memorandum Items

- Memorandum items provide additional details related to claims on an ultimate-risk basis.

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Breakdown of Total of Columns 1 through 10	Memorandum					Trading Assets	
			Collateral Held Against Claims With No Risk Transfer (Reported in Columns 1 through 10 - By Counterparty)					Trading Assets (Reported in Columns 1 through 10)	Offsetting Positions for Trading Book
			Securities (HTM and AFS)	Total Collateral	Of Which, Cash	Of Which, Same Country	Of Which, Resale and Reverse Repurchase Agreements and Securities Lending (Counterparty)		
Country (a)	Code (b)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	

Securities (Held-to-Maturity (HTM) and Available-for-Sale (AFS)) – (Column 12)

- Claims reported in columns 1 through 10 of Schedule C, Part II, by country of issuer, that are classified as HTM or AFS.
 - HTM - Amortized cost
 - AFS - Fair value



Sch C – Part II – Memorandum Items

Collateral Held Against Claims with No Risk Transfers (Columns 13 - 16) –

- Claims backed by eligible collateral that were not subject to risk transfers, reported in columns 1 through 10 of Schedule C, Part II –
 - Collateral provided by the immediate obligor that did not meet the definition of collateral for required risk-transfers -
 - Resale agreements
 - Securities lending arrangements
 - Claims collateralized with securities or cash in which the issuer of securities or the entity holding the cash are from the same sector and country as the immediate obligor.

Note: Claims backed by guarantees, with the exception of collateral, from entities located in the same sector and country as the immediate obligor should not be included.



Sch C – Part II – Memorandum Items

Collateral Held Against Claims with No Risk Transfers (Columns 13 - 16) (Cont.) –

- Total Collateral – (Column 13)
 - Claims backed by eligible collateral, reported in columns 1 through 10 of Schedule C, Part II, that are not subject to risk transfers.
 - Reported by the country of the counterparty.
 - Resale agreements and securities borrowed may be reported net consistent with ASC Topic 210-20.
- Of Which Cash – (Column 14)
 - Claims collateralized with cash, reported in columns 1 through 10 of Schedule C, Part II, that are not subject to risk transfers.
 - Reported by the country of the counterparty.



Sch C – Part II – Memorandum Items

Collateral Held Against Claims with No Risk Transfers (Columns 13 - 16) (Cont.) –

- Of Which Same Country – (Column 15)
 - Collateralized claims, not subject to risk transfers, where the country of the ultimate-obligor (issuer of securities or holder of cash) is the same as that of the immediate-counterparty.
- Of Which Resale and Reverse Repurchase Agreements and Securities Lending – (Column 16)
 - Collateralized claims reported in columns 1 through 10 of Schedule C part II, that are resale, reverse repurchase and securities lending agreements .
 - Reported by the country of the counterparty.



Sch C – Part II – Memorandum Items

Collateral Held Against Claims with No Risk Transfers (Columns 13 - 16) (Cont.) –

- Note:
 - Columns 14 through 16 are not mutually exclusive.
 - Over collateralized claims – report only up to the amount of the claim.
 - Partially collateralized claims – report amount of the claim that is collateralized.
 - Claims where collateral is from an obligor in the same country and sector as the immediate counterparty should not be reallocated. In addition, this collateral should not be reported in Columns 13 through 16 of Schedule C, Part II. (FAQ 19)



Sch C – Part II – Memorandum Items – Example

Example 16 -

The reporter's Cayman Islands branch enters into a \$50 million overnight resale agreement with a non-bank financial institution domiciled in the UK. The resale agreement is collateralized with debt issued by the UK government. Entries would be:

Schedule C Part I entries:

Schedule C, Part I: Claims on an Immediate Risk Basis		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
United Kingdom	13005			50								50		

Schedule C, Part I: Claims on an Immediate Risk Basis		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
United Kingdom	13005										

71

Sch C – Part II – Memorandum Items – Example (Cont.)

Example 16 (Cont.) -

Schedule C Part II entries:

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items		Ultimate-Risk Basis											Breakdown of Total of Columns 6 through 10	Claims in Non-Local Currency
		Cross-Border Claims					Claims on Local Residents							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)		
United Kingdom	13005			50										

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items		Memorandum							
		Breakdown of Total of Columns 1 through 10	Collateral Held Against Claims With No Risk Transfer (Reported in Columns 1 through 10 - By Counterparty)				Trading Assets		
			Securities (HTM and AFS)	Total Collateral	Of Which, Cash	Of Which, Same Country	Of Which, Resale and Reverse Repurchase Agreements and Securities Lending (Counterparty)	Trading Assets (Reported in Columns 1 through 10)	Offsetting Positions for Trading Book
Country (a)	Code (b)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	
United Kingdom	13005		50		50	50			

72

Sch C – Part II – Memorandum Items – Example

Example 16b -

The reporter's Cayman Islands branch enters into a \$50 million overnight resale agreement with a UK branch of a Japanese bank. The resale agreement is collateralized with debt issued by the UK government. Entries would be:

Schedule C Part I entries:

Schedule C, Part I: Claims on an Immediate Risk Basis		Immediate-Counterparty Basis											Breakdown of Total of Columns 1 through 10 Remaining Maturity Up to and Including 1 Year	Claims on Local Residents in Local Currency
		Cross-Border Claims					Claims on Local Residents in Non-Local Currency							
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households			
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
United Kingdom	13005	50										50		

Schedule C, Part I: Claims on an Immediate Risk Basis		Redistribution of Claims to Adjust for Ultimate Risk									
		Outward Risk Transfers of Claims Reported in Columns 1 through 10 and 12 or on U.S. Residents					Inward Risk Transfers of Claims Reported in Columns 13 through 17				
		Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households	Claims on Banks	Claims on Public	Claims on NBFIs	Claims on Corporate	Claims on Households
Country (a)	Code (b)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
United Kingdom	13005	50									
Japan	42609						50				

Sch C – Part II – Memorandum Items – Example (Cont.)

Example 16b (Cont.) -

Schedule C Part II entries:

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items		Ultimate-Risk Basis										Breakdown of Total of Columns 6 through 10 Claims in Non-Local Currency
		Cross-Border Claims					Claims on Local Residents					
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Japan	42609	50										

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items		Memorandum						
		Breakdown of Total of Columns 1 through 10 Securities (HTM and AFS)	Collateral Held Against Claims With No Risk Transfer (Reported in Columns 1 through 10 - By Counterparty)			Trading Assets		
			Total Collateral	Of Which, Cash	Of Which, Same Country	Of Which, Resale and Reverse Repurchase Agreements and Securities Lending (Counterparty)	Trading Assets (Reported in Columns 1 through 10)	Offsetting Positions for Trading Book
Country (a)	Code (b)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
Japan	42609							

Sch C – Part II – Memorandum Items

▪ Trading Assets – (Column 17)

- Trading assets reported in columns 1 through 10 of Schedule C, Part II.
- Reported at Fair Value
- Exclude derivative claims
- “CUSIP netting” – permissible if position was reported net in columns 1 through 10
 - “Cusip netting” refers to the industry practice where trading assets and trading liabilities in the same exact security (based on its security identifier) may be reported on a net basis.



Sch C – Part II – Memorandum Items

CUSIP Netting: Industry vs. 009

- CUSIP Netting is an industry practice that allows netting of trading assets against trading liabilities in the same security (i.e., with the same CUSIP or ISIN)
- “CUSIP Netting” of long and short positions is permitted on the 009, only when the issuer of the underlying security and the foreign offices holding the long and short positions are in the same country.



Sch C – Part II – Memorandum Items

Offsetting Positions for Trading Book – (Column 18)

- Short positions in securities that have the same issuer (on a legal entity basis) and broad instrument type (debt versus debt and equity versus equity), as the long positions reported in column 17.
- Short position exceeds long position – report only up to the amount of the long position.



Sch C – Part II – Memorandum Items – Example

Example 17-

The reporter's UK office holds \$20 million in long-term bonds, denominated in Danish krone, issued by a non-financial corporation domiciled in Denmark. The reporter classifies these holdings as Held-for-Trading. The UK office is also short on \$5 million in intermediate-term bonds, denominated in Danish krone and issued by the same non-financial corporation in Denmark, with a broker/dealer domiciled in France. The entries are:

Schedule C Part II entries:

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Ultimate-Risk Basis										Breakdown of Total of Columns 6 through 10 Claims in Non-Local Currency
		Cross-Border Claims					Claims on Local Residents					
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Denmark	10502				20							



Sch C – Part II – Memorandum Items – Example (Cont.)

Example 17 (Cont.) -

Schedule C Part II entries (cont):

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Breakdown of Total of Columns 1 through 10	Memorandum					Trading Assets	
			Collateral Held Against Claims With No Risk Transfer (Reported in Columns 1 through 10 - By Counterparty)					Trading Assets (Reported in Columns 1 through 10)	Offsetting Positions for Trading Book
			Securities (HTM and AFS)	Total Collateral	Of Which, Cash	Of Which, Same Country	Of Which, Resale and Reverse Repurchase Agreements and Securities Lending (Counterparty)		
Country (a)	Code (b)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	
Denmark	10502						20	5	

Schedule L entries:

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			
		By Country of Foreign Office		By Country of Creditor	Net Due to (or Due From) Own Related Offices in Other Countries
		Foreign-Office Liabilities in Non-Local Currency	Foreign-Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
United Kingdom	13005	5			
France	10804			5	



Sch C – Part II – Memorandum Items – Example

Example 17b-

The reporter's UK office holds \$20 million in long-term bonds, denominated in GBP, issued by a non-financial corporation domiciled in UK. The reporter classifies these holdings as Held-for-Trading. The UK office is also short on \$5 million in the same long-term bonds (same CUSIP), denominated in GBP and issued by the same non-financial corporation in UK, with a broker/dealer domiciled in France. The entries are:

Schedule C Part II entries:

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Ultimate-Risk Basis										Breakdown of Total of Columns 6 through 10
		Cross-Border Claims					Claims on Local Residents					
		Banks	Public	NBFIs	Corporate	Households	Banks	Public	NBFIs	Corporate	Households	
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
UK	10502									15		



Sch C – Part II – Memorandum Items – Example (Cont.)

Example 17b (Cont.) -

Schedule C Part II entries (cont):

Schedule C, Part II: Claims on an Ultimate Risk Basis and Memorandum Items In Millions of U.S. Dollars		Breakdown of Total of Columns 1 through 10	Memorandum				Trading Assets	
			Collateral Held Against Claims With No Risk Transfer (Reported in Columns 1 through 10 - By Counterparty)				Trading Assets (Reported in Columns 1 through 10)	Offsetting Positions for Trading Book
			Total Collateral	Of Which, Cash	Of Which, Same Country	Of Which, Resale and Reverse Repurchase Agreements and Securities Lending (Counterparty)		
Country (a)	Code (b)	Securities (HTM and AFS) (12)	(13)	(14)	(15)	(16)	(17)	(18)
UK	10502						15	

Schedule L entries:

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			
		By Country of Foreign Office		By Country of Creditor	Net Due to (or Due From) Own Related Offices in Other Countries
		Foreign-Office Liabilities in Non-Local Currency	Foreign-Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
United Kingdom	13005				
France	10804				



Common Reporting Errors

- Reporting positions with foreign-subsiaries and branches that are part of the consolidated bank or bank holding company filing the Country Exposure Report.
- Excluding claims on unconsolidated subsidiaries. These are considered to be positions with third-party entities and should be included in the Country Exposure Report.
- Reporting positions with foreign-central banks and U.S. Federal Reserve as claims on banks as opposed to claims on "Public" entities.
- Claims covered by guarantees/ collateral not reallocated from an immediate to ultimate risk basis.
- CUSIP netting is not being applied consistently within the parameters set forth in the instructions/FAQ.



Common Reporting Errors - Continued

- Inward and Outward risk transfers do not balance in Schedule C Part I in the risk redistribution section.
- Incorrect sector classification of counterparties. i.e., government agencies should be reported as Public not NBF.
- Claims should always be reported in both Schedule C Parts I and II.
- Immediate claims should be risk transferred only up to the amount of the guarantee or collateral provided.
- Column 18 in Schedule C Part II is NOT an “of which” item.



Schedule L – Liabilities Rob Braccia



Schedule L – Foreign-Office Liabilities

U.S. Dollar Amounts in Millions		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries	
		By Country of Foreign Office		By Country of Creditor		
FCEX	9151 Country (a)	9207 Code (b)	Foreign-Office Liabilities in Non-Local Currency C938 (1)	Foreign-Office Liabilities in Local Currency C939 (2)	Total Liabilities Booked at Foreign Offices C940 (3)	8595 (4)

- Examples of liabilities:
 - Deposits (regardless if netted on Schedule D)
 - Brokerage balances
 - Debt securities issued
 - Borrowings
 - Repurchase agreements (by counterparty)
 - Short sales (by counterparty)
 - Trade date payables
 - Exclude negative fair value of derivatives

- Liabilities of reporter's consolidated foreign offices, only.



Schedule L – Foreign-Office Liabilities

- Columns 1 and 2 differentiated by currency.
 - Column 1: foreign-office liabilities that are in a currency other than one which the country's government has authority to issue.
 - Column 2: foreign-office liabilities that are in a currency which the country's government has authority to issue.

- Report by country of the reporter's foreign office

- Liabilities may be to third-parties located anywhere, including U.S. on immediate counterparty basis.

- Liabilities of reporter's branch are assumed to be liabilities of that branch, unless explicitly redeemable in another country.



Schedule L – Foreign-Office Liabilities

- In Column 3, report all liabilities booked at any of the reporter’s foreign offices, regardless of currency, by country of creditor (i.e. immediate counterparty basis).
- Include all liabilities reported in Columns 1 and 2:
 - International & Regional Orgs.
 - United States
 - “Unallocated”
- Use of “unallocated” only for negotiable/bearer liabilities where reporter does not know identity of creditor on as-of date.



Schedule L – Foreign-Office Liabilities

- On a Grand-Total basis, the foreign office liabilities reported in Column 3 (which is by country of creditor, regardless of foreign office location) is expected to **be equal to or greater than** the sum of the foreign office liabilities reported in Columns 1 and 2 (which are by country of foreign office).
 - These balances are expected to be reasonably close unless the respondents’ foreign office liabilities are payable outside of the country in which their foreign office is located (not reportable in Columns 1 and 2).



Schedule L - Examples

Example 1

- The reporter's U.K. branch holds 5 million in deposit liabilities, denominated in USD, placed by a hedge fund customer in the Cayman Islands. No payment is guaranteed outside the U.K.

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries
		By Country of Foreign Office		By Country of Creditor	
		Foreign- Office Liabilities in Non-Local Currency	Foreign- Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
United Kingdom	13005	5			
Cayman Islands	36137			5	



Schedule L - Examples

Example 2

- The reporter's U.K. branch holds 100 million in deposits, denominated in Euros, placed by a U.K. branch of a German bank. The funds are payable anywhere the reporter has an office.

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries
		By Country of Foreign Office		By Country of Creditor	
		Foreign- Office Liabilities in Non-Local Currency	Foreign- Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
United Kingdom	13005			100	



Schedule L - Examples

Example 3

- The reporter's broker/dealer, located in the U.S., enters into a 10 million repurchase agreement, denominated in Euros, with a bank in Germany.

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries
		By Country of Foreign Office		By Country of Creditor	
		Foreign- Office Liabilities in Non-Local Currency	Foreign- Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
Germany	11002				
United States	13005				



Schedule L – Foreign-Office Liabilities

- “Short sales” are to be reported opposite the country of the foreign branch or subsidiary entering into the short sale in Columns 1 and 2, and opposite the country of the counterparty to the short sale (to whom delivery is owed) in Column 3.
 - Reporting is not based on the issuer of the security or the counterparty from which the security will be purchased.
 - “CUSIP netting” of long and short positions is permitted, only when the issuer of the underlying security and the foreign offices holding the long and short positions are in the same country.



Schedule L - Examples

Example 4

- The reporter's Japanese subsidiary sells a Japanese government debt security that it does not own to an investment company in China for 20 million, denominated in Yen. The as-of date falls between the trade date and settlement date, but before arrangements were made to borrow the security.

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries
		By Country of Foreign Office		By Country of Creditor	
		Foreign- Office Liabilities in Non-Local Currency	Foreign- Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
China Mainland	41408			20	
Japan	42609		20		



Schedule L - Examples

Example 5

- Assuming the same details as Example 4, but the reporter's Japanese subsidiary also has 15 million of long positions, denominated in Yen, in the Japanese government debt (same CUSIP).

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries
		By Country of Foreign Office		By Country of Creditor	
		Foreign- Office Liabilities in Non-Local Currency	Foreign- Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
China Mainland	41408			5	
Japan	42609		5		



Schedule L – Foreign-Office Liabilities

- Cash collateral placed by obligors at the reporter’s foreign office to offset positive fair value positions of derivative contracts should be reported as a foreign office liability opposite the country of the foreign office holding the cash collateral in Columns 1 and 2, and opposite the country of the obligor who provided the cash collateral in Column 3.
 - Reportable on Schedule L regardless if transactions are executed under a legally enforceable master netting agreement and offsetting is in accordance with ASC 815-10.



Schedule L - Examples

Example 6

- A hedge fund in the U.K. places 50 million in cash collateral, denominated in GBP, with the reporter’s Cayman Islands branch to offset the positive fair value of a derivative contract entered into with the reporter.

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries
		By Country of Foreign Office		By Country of Creditor	
		Foreign- Office Liabilities in Non-Local Currency	Foreign- Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
United Kingdom	13005			50	
Cayman Islands	36137	50			



Schedule L – Due To/Due From

Column 4

- Only place where intercompany positions are captured
- Report single net number for all offices in a given country
- Include unremitted profits and capital contribution accounts of branch offices and the equity investment in consolidated subsidiaries
- Include positive and negative fair-value of derivatives



Schedule L – Due To/Due From

- Due To (Liability)
 - Reported as positive on report
 - From country listed to office in another country
- Due From (Claim)
 - Reported as negative on report
- In theory, should equal zero on global basis.



Schedule L - Examples

Example 7

- UK subsidiary places \$15 million deposits with Cayman branch.
- US Head Office loans UK subsidiary \$5 million.
- Cayman branch buys \$8 million in Canadian government debt.
- Japanese investment bank subsidiary conducts \$7 million in resale agreements with German branch of UK subsidiary.

Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		Foreign-Office Liabilities			Net Due to (or Due From) Own Related Offices in Other Countries
		By Country of Foreign Office		By Country of Creditor	
		Foreign- Office Liabilities in Non-Local Currency	Foreign- Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
Germany	11002				7
United Kingdom	13005				-10
Cayman Islands	36137				15
Japan	42609				-7
Canada	29998				
United States	01007				-5
Grand Total	99996				0



Schedule O Off Balance – Sheet Items



Schedule O – Off-Balance Sheet Items

U.S. Dollar Amounts in Millions		Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Columns 1 through 10 of Schedule C, Part II and Columns 1 and 2 of Schedule O that are Trade Finance	
		Unused Commitments	Guarantees (Excluding Credit Derivatives Sold)	Gross-Gross		Gross-Net			
				Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold		
FCEX	9151	9207	C936	M875	M876	M877	M878	M879	C941
	Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)

■ Captures off-balance sheet items

- Unused Commitments – (Identical to FR Y-9C definition)
- Guarantees
- Credit Derivatives Purchased and Sold
 - Gross-Gross
 - Gross-Net
- Trade Finance



Schedule O – Unused Commitments

Column 1 - Unused Commitments

- Ultimate-risk basis
- Legally binding
- Include:
 - Outstanding and unused letters of credit
 - Risk participations
 - Undrawn credit card commitments
- Exclude:
 - “Best efforts” letters
 - Financial and performance standby letters of credit



Schedule O – Unused Commitments

Column 1 - Unused Commitments

- Shared Credit Facility
 - For multiple obligors located in different countries, ultimate obligor is one with highest credit rating.
 - If equally rated, allocate based on reporter's internal risk criteria.



Schedule O – Unused Commitments

Example 1

- The respondent has credit card commitments totaling \$25 million with individual and corporate customers legally established in Germany. The respondent's customers in France also have undrawn home equity lines of credit for \$40 million.

Schedule O: Off Balance-Sheet Items
In Millions of U.S. Dollars

Country (a)	Code (b)	Credit Derivatives (By Reference Entity)						Amounts Reported in Col 1-10 Part 2 & Col 1 & 2 of Sch O that are Trade Finance
		Cross-Border and Foreign-Office Commitments and Guarantees		Gross-Gross		Gross-Net		
		Unused Commitments	Guarantees (Excluding CDS)	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
(1)	(2)	(3)	(4)	(5)	(6)	(7)		
France	10804	40						
Germany	11002	25						



Schedule O – Unused Commitments

Example 2

- The respondent issues a commercial letter of credit for \$100 million to a company incorporated in Germany.
- The company is the subsidiary of a holding company in France. French parent explicitly guarantees all liabilities of its subs.
- \$75 million of the L/C was participated out to an unaffiliated bank in Japan.

**Schedule O: Off Balance-Sheet Items
In Millions of U.S. Dollars**

Country (a)	Code (b)	Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Col 1-10 Part 2 & Col 1 & 2 of Sch O that are Trade Finance
		Unused Commitments	Guarantees (Excluding CDS)	Gross-Gross		Gross-Net		
				Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
(1)	(2)	(3)	(4)	(5)	(6)	(7)		
France	10804	25						
Germany	11002	-						
Japan	42609	75						



Schedule O – Guarantees

Column 2 – Guarantees, excluding credit derivatives sold

- Exclude credit derivatives sold
- Ultimate-risk basis
- Legally binding
- Include:
 - Outstanding and unused standby letters of credit
 - Commitments to issue standby letters of credit
 - Insurance policies written
 - Other guarantees
- Other exclusions:
 - Guarantees between consolidated unit of the reporter
 - Property/casualty and life insurance policies, as well as associated reinsurance policies purchased



Schedule O – Guarantees

Example 3

- The respondent issues a \$10 million standby letter of credit, for the purposes of facilitating international trade, on behalf of a manufacturing company in South Korea. The customer's trading counterparty (the beneficiary) is a manufacturing company in Japan.

Schedule O: Off Balance-Sheet Items In Millions of U.S. Dollars

Country (a)	Code (b)	Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Col 1 - 10 Part 2 & Col 1 & 2 of Sch O that are Trade Finance
				Gross-Gross		Gross-Net		
		Unused Commitments (1)	Guarantees (Excluding CDS) (2)	Total Credit Derivatives Purchased (3)	Total Credit Derivatives Sold (4)	Total Credit Derivatives Purchased (5)	Total Credit Derivatives Sold (6)	
Japan	42609		-					-
Korea, South	43001		10					10

107

Schedule O – Credit Derivatives

Columns 3 - 6 – Notional value of credit derivatives purchased and sold (by country of reference entity).

Credit Derivatives (By Reference Entity)			
Gross-Gross		Gross-Net	
Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold
M876	M877	M878	M879
(3)	(4)	(5)	(6)

- Use notional values
- Report positive fair values on Schedule D
- Report by underlying reference entity (i.e. country of incorporation of ultimate legal entity contract references)

108

Schedule O – Credit Derivatives

- Credit protection purchased to hedge/offset protection sold, or for speculative purposes.
- Contracts on indexes or baskets (such as iTraxx) to be broken out and reported on pro-rata basis
- The “unallocated” row is only for tranche, bespoke, or “nth-to-default” credit derivative contracts where reference entities cannot be determined
 - Where payments are triggered by a credit event in any one of the reference entities.



Schedule O – Credit Derivatives

Example 4

- The respondent purchases a \$25 million 3rd-to-default CDS contract from a bank in the U.K. The underlying reference entities in this CDS are located in multiple countries. Payment to the respondent would only occur when, amongst a set of reference entities, the 3rd default occurs (not a particular reference entity). This balance would be reported as “Unallocated”.

Schedule O: Off Balance-Sheet Items In Millions of U.S. Dollars		Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Columns 1 through 10 of Part II and Columns 1 and 2 of Schedule
				Gross-Gross		Gross-Net		
		Unused Commitments	Guarantees (Excluding Credit Derivatives Sold)	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Unallocated	88862			25		25		



Schedule O – Credit Derivatives

Columns 3 and 4 – “Gross-Gross”

- Column 3 – “Total Credit Derivatives Purchased”
 - Excludes amounts used for risk-transfers in Schedule C, Parts I and II.
 - Only risk transfer up to amount of underlying claims in Schedule C, remainder is reported here.
- Column 4 – “Total Credit Derivatives Sold”
 - By country of ultimate obligor of reference credit, including when reporter is the guarantor providing protection



Schedule O – Credit Derivatives

Columns 5 and 6 – “Gross-Net”

- Net contracts reported in Columns 3 and 4:

In order to net, all of the following must apply:

- Offsetting purchased/sold positions on same reference entity (legal entity basis)
- Contracts are with the same counterparty
- Contracts are subject to legally enforceable master netting agreement

Amounts not eligible for netting, to be reported gross



Schedule O - Examples

Example 4

- The respondent sells \$10 million CDS contract to a hedge fund in the Cayman Islands. The underlying is a German bank. Assume no other contracts.

Schedule O: Off Balance-Sheet Items
In Millions of U.S. Dollars

Country (a)	Code (b)	Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Col 1-10 Part 2 & Col 1 & 2 of Sch O that are Trade Finance
		Unused Commitments	Guarantees (Excluding CDS)	Gross-Gross		Gross-Net		
				Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
(1)	(2)	(3)	(4)	(5)	(6)	(7)		
Germany	11002				10		10	
Cayman	36137				-		-	



Schedule O - Examples

Example 5

- The respondent purchases a \$50 million CDS contract from a bank in Japan. The underlying is an iTraxx Europe Sovereign index. Assume it is equally weighted between the sovereign debt of the UK, France, Germany, Switzerland and the Netherlands. These were not purchased to hedge a balance-sheet position.

Schedule O: Off Balance-Sheet Items
In Millions of U.S. Dollars

Country (a)	Code (b)	Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Col 1-10 Part 2 & Col 1 & 2 of Sch O that are Trade Finance
		Unused Commitments	Guarantees (Excluding CDS)	Gross-Gross		Gross-Net		
				Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
(1)	(2)	(3)	(4)	(5)	(6)	(7)		
France	11002			10		10		
Germany	36137			10		10		
Netherlands	12106			10		10		
Switzerland	12688			10		10		
UK	13005			10		10		



Schedule O - Examples

Example 6

- The respondent sells \$25 million CDS contract to a bank in Japan. The underlying is a South Korean Bank. The respondent also purchases a \$10 million CDS contract from the same counterparty. The underlying is a South Korean manufacturing company.

Schedule O: Off Balance-Sheet Items
In Millions of U.S. Dollars

Country (a)		Code (b)		Credit Derivatives (By Reference Entity)				Amounts Reported in Col 1 - 10 Part 2 & Col 1 & 2 of Schedule O that are Trade Finance		
				Cross-Border and Foreign-Office Commitments and Guarantees		Gross-Gross			Gross-Net	
				Unused Commitments	Guarantees (Excluding CDS)	Total Credit Derivatives Purchased	Total Credit Derivatives Sold		Total Credit Derivatives Purchased	Total Credit Derivatives Sold
(1)	(2)	(3)	(4)	(5)	(6)	(7)				
Korea, South	43001			10	25	10	25			

Note:

This scenario holds with or without a master netting agreement.



Schedule O - Examples

Example 6, cont.

- Assume same fact pattern as before, but now the underlying reference entity (South Korean manufacturing company) is the same for both contracts and a master netting agreement exists between both counterparties.

Schedule O: Off Balance-Sheet Items
In Millions of U.S. Dollars

Country (a)		Code (b)		Credit Derivatives (By Reference Entity)				Amounts Reported in Col 1 - 10 Part 2 & Col 1 & 2 of Schedule O that are Trade Finance		
				Cross-Border and Foreign-Office Commitments and Guarantees		Gross-Gross			Gross-Net	
				Unused Commitments	Guarantees (Excluding CDS)	Total Credit Derivatives Purchased	Total Credit Derivatives Sold		Total Credit Derivatives Purchased	Total Credit Derivatives Sold
(1)	(2)	(3)	(4)	(5)	(6)	(7)				
Korea, South	43001			10	25	0	15			



Schedule O – Trade Finance

Column 7

- Report extensions of credit if all of the following criteria are met:
 - Maturities one year or less
 - Directly related to imports or exports*and*
 - Liquidated through the proceeds of international trade
- Amounts are reported in Columns 1 through 10 of Schedule C, Part II, or Columns 1 or 2 of Schedule O.
- Products include commercial L/Cs, certain bankers' acceptances.



Schedule O – Guarantees

Recall from Example 3

- The respondent issues a \$10 million standby letter of credit, for the purposes of **facilitating international trade**, on behalf of a manufacturing company in South Korea. The customer's trading counterparty (the beneficiary) is a manufacturing company in Japan.

Schedule O: Off Balance-Sheet Items
In Millions of U.S. Dollars

Country (a)	Code (b)	Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)				Amounts Reported in Col 1 - 10 Part 2 & Col 1 & 2 of Sch O that are Trade Finance
				Gross-Gross		Gross-Net		
		Unused Commitments	Guarantees (Excluding CDS)	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold	
(1)	(2)	(3)	(4)	(5)	(6)	(7)		
Japan	42609		-					-
Korea, South	43001		10					10



Schedule O - Common Reporting Errors

- Reporting CDS contracts by counterparty, not underlying reference entity.
- Reporting CDS index contracts based on country of issuer of the index.
- Exclusion of trade-related claims and guarantees/commitments due to misclassification.
- Misclassifying commitments that have been drawn upon.



Schedule D Claims from Positions in Derivative Contracts



Sch D – Claims from Positions in Derivative Contracts

- Collects information on the positive fair value of the reporting institution’s derivative contracts by country and sector of the ultimate counterparty.

Schedule D: Claims from Positions in Derivative Contracts In Millions of U.S. Dollars		Fair Value of Foreign Exchange and Derivative Products					Memorandum
		Banks	Public	NBFIs	Other	Total	Claims on Branches with no Guarantee from Parent
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)

- Note:
 - All claims are reported on an ultimate-risk basis.
 - Claims on a bank’s branches are assumed to have an implicit credit guarantee of the head office, and are reported in the country of the head office.
 - Claims where cash collateral is held by the reporting bank or its related branch/subsidiary, should be risk transferred to “Bank” sector of the U.S.



Sch D – Offsetting – Cash Collateral

- Positive fair values may be offset against negative fair values and cash collateral held if, and only if –**
 - Transactions are executed with the same counterparty **and** Transactions are governed by a legally enforceable master netting agreement under ASC Subtopic 210-20, Balance Sheet – Offsetting (formerly FASB Interpretation No. 39, “Offsetting of Amounts Related to Certain Contracts”).
- When offsetting is not applicable or exercised, regardless if cash collateral is held by a related or third party –**
 - The collateralized portion of the fair value should be reallocated to the country and sector of where the cash is held.
 - The uncollateralized portion should be reported according to the sector and country of the ultimate counterparty.



Sch D – Offsetting – Cash Collateral

- **Regardless of whether a master netting agreement exists, cash collateral held by the reporter’s foreign office, provided by obligors to offset positive fair value positions of derivative contracts should be reported as a foreign office liability in Schedule L:**
 - Column 1 or 2, as appropriate, according to the location of the foreign office holding the cash collateral
 - Columns 3 according to the country of the creditor, i.e., the obligor who provided the cash collateral.

- **If cash collateral is held by the reporter’s branch or consolidated subsidiary, the collateral should be reallocated to the “Banks” sector of the United States on Schedule D.**



Sch D – Offsetting – Securities Collateral

- **When collateral is provided in the form of securities–**
 - The collateralized portion of the fair value should be reallocated to the country and sector of the issuer of the security

 - The uncollateralized portion should be reported according to the sector and country of the ultimate counterparty.

 - Netting is not allowed



Sch D – Claims from Positions in Derivative Contracts

- Contracts covered by master netting agreements –
 - Single netting agreement –
 - Master netting agreement entered into by a single office of the reporter with another party.
 - Net residual amount, if positive, is reported in the country of residence of the ultimate counterparty.
 - Multi-branch or multi-jurisdiction master netting agreement –
 - Master netting agreement that covers the head office and other offices of the reporter.
 - Net residual amount, if positive, is reported in the country of residence of the ultimate counterparty.
 - Contracts covered by a master netting agreement are deemed to carry the legal guarantee of the head office.
- Contracts not covered by master netting agreements – reported gross.



Sch D – Claims from Positions in Derivative Contracts

- **Fair Value of Foreign Exchange and Derivative Products – (Columns 1 – 4)**
 - Reported in the country of residence of the ultimate obligor
 - Broken down by counterparty type (Banks, Public entities, Non-bank financial institutions and “Other”)
 - “Other” includes households and corporations.
 - When a contract is entered into with a branch of a commercial bank, a claim is reported against the country of the head office
 - Implicit credit guarantee



Sch D – Claims from Positions in Derivative Contracts

▪ Claims on Branches with no explicit Guarantee from Parent – (Column 6)

- Claim not formally or legally guaranteed by the head office of the bank branch.
- Reflect risk that could potentially remain in the countries where the branches are located.
- Claims reported opposite the country in which the bank branch is located.

Exclusions:

- Contracts covered by master netting agreements are deemed to carry the legal guarantee of the head office.



Sch D – Claims from Positions in Derivative Contracts – Examples

Example 1-

The reporter's UK securities broker subsidiary has a portfolio of OTC derivative trades with a positive fair value of \$150 million with a bank in UK. The UK bank posts \$120 million in cash as collateral, that is held by a third-party bank domiciled in France. Entries would be:

Schedule D: Claims from Positions in Derivative Contracts In Millions of U.S. Dollars		Fair Value of Foreign Exchange and Derivative Products					Memorandum
		Banks	Public	NBFIs	Other	Total	Claims on Branches with no Guarantee from Parent
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)
United Kingdom	13005	30				30	
France	10804	120				120	

▪ Note:

In this scenario, no master netting agreement is in place.



Sch D – Claims from Positions in Derivative Contracts – Examples

Example 1 (Cont.) –

Consider the same fact pattern, The reporter and the France bank have a multi-jurisdiction master netting agreement encompassing all the subsidiaries and branches of the two counterparties. Entries would be:

Schedule D: Claims from Positions in Derivative Contracts In Millions of U.S. Dollars		Fair Value of Foreign Exchange and Derivative Products					Memorandum
		Banks	Public	NBFIs	Other	Total	Claims on Branches with no Guarantee from Parent
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)
United Kingdom	13005	30				30	

Consider the same fact pattern, only instead of the cash collateral, the UK bank posts \$120 mil in UK government debt as collateral. Entries would be:

Schedule D: Claims from Positions in Derivative Contracts In Millions of U.S. Dollars		Fair Value of Foreign Exchange and Derivative Products					Memorandum
		Banks	Public	NBFIs	Other	Total	Claims on Branches with no Guarantee from Parent
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)
United Kingdom	13005	30	120			150	

129

Sch D – Claims from Positions in Derivative Contracts – Examples

Example 2- The respondent (U.S. Bank), and its consolidated U.S. and foreign offices, enters into various derivative contracts with a counterparty (Japan Bank and its various branches) for \$900 million.

The reporters U.S. and foreign offices have balances with the Japan Banks: Hong Kong branch for \$300 million, U.K. branch for \$250 million, and U.S. branch for \$20 million. The remaining \$330 million is held with Tokyo branches of the Japan Bank.

Assuming the respondent has no master netting agreement and that claims on bank branches are not formally and legally guaranteed by the head office. Entries would be:

Schedule D: Claims from Positions in Derivative Contracts In Millions of U.S. Dollars		Fair Value of Foreign Exchange and Derivative Products					Memorandum
		Banks	Public	NBFIs	Other	Total	Claims on Branches with no Guarantee from Parent
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)
Japan	42609	900				900	
Hong Kong	42005						300
United Kingdom	13005						250
United States	01007						20

130

Sch D – Claims from Positions in Derivative Contracts – Examples

Example 3 -

The reporter's U.K. securities broker subsidiary has a foreign exchange swap contract with a positive fair value of \$100 million with the Cayman Islands nonbank subsidiary of a bank domiciled in the U.K. The reporter and the U.K. bank have a multi jurisdiction master netting agreement encompassing all the subsidiaries and branches of the two counterparties.

For collateral, the Cayman Islands subsidiary posts \$50 million in U.K. sovereign debt and \$20 million in cash as collateral which is held by directly by the reporter's U.K. bank subsidiary. Entries would be:

Schedule D: Claims from Positions in Derivative Contracts In Millions of U.S. Dollars		Fair Value of Foreign Exchange and Derivative Products					Memorandum Claims on Branches with no Guarantee from Parent
		Banks	Public	NBFIs	Other	Total	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)
United Kingdom	13005	30	50			80	



Sch D – Claims from Positions in Derivative Contracts – Examples

Example 3 (Cont.) -

Consider the same fact pattern described above, but assume that there is no master netting agreement. Entries would be:

Schedule D: Claims from Positions in Derivative Contracts In Millions of U.S. Dollars		Fair Value of Foreign Exchange and Derivative Products					Memorandum Claims on Branches with no Guarantee from Parent
		Banks	Public	NBFIs	Other	Total	
Country (a)	Code (b)	(1)	(2)	(3)	(4)	(5)	(6)
United Kingdom	13005		50			50	
Cayman Islands	36137			30		30	
United States	01007	20				20	



Sch D – Claims from Positions in Derivative Contracts – Examples

Example 3 (Cont.) -

A reminder to report the cash collateral on Schedule L:

Foreign-Office Liabilities					
Schedule L: Foreign-Office Liabilities In Millions of U.S. Dollars		By Country of Foreign Office		By Country of Creditor	Net Due to (or Due From) Own Related Offices in Other Countries
		Foreign-Office Liabilities in Non-Local Currency	Foreign-Office Liabilities in Local Currency	Total Liabilities Booked at Foreign Offices	
Country (a)	Code (b)	(1)	(2)	(3)	(4)
United Kingdom	13005	20			
Cayman Islands	36137			20	



Schedule D - Common Reporting Errors

- Reporting claims resulting from the positive fair value on derivative contracts on Schedule C.
- Reporting positions on a net basis when not covered by a master netting agreement.
- Reporting cash collateral held by the reporter's foreign office according to the location of the foreign office.
- Reporting positive fair values net of securities collateral, instead of based on the issuer of the collateral



FFIEC 009A Country Exposure Information Report



FFIEC 009a – Country Exposure Information Report

- The report provides public disclosure of significant country exposures of U.S. banking institutions through the FFIEC's statistical release E.16 . (<http://www.ffiec.gov/E16.htm>)
- Part A Report Form

U.S. Dollar Amounts in Millions		Amount of Cross-border Claims Outstanding After Mandated Adjustments for Transfer of Exposure (Excluding Derivative Products)	Amount of Foreign Office Claims on Local Residents (Excluding Derivative Products)	Amount of Gross Claims Outstanding from Derivative Products after Mandated Adjustments for Transfer of Exposure	Total of Columns (1) Plus (2)	Gross Foreign-Office Liabilities	Distribution of Amounts in Columns 1 and 2 (Except Column 13)								
							By Type of Borrower				By Maturity		Trading Assets		
							Banks	Public	NBFI's	Other	One Year and Under	Over One Year	Trading Assets	Offsetting Positions for Trading Book	Securities (HTM and AFS)
Country	CEXA	M881	M882	4254	M883	M884	M885	M886	M887	M888	M889	M956	M874	M869	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)		
CEX59209	CEXA	5215	M881	M882	4254	M883	M884	M885	M886	M887	M888	M889	M956	M874	M869

Collateral Held Against Claims With No Risk Transfer (Reported in Columns 1 and 2—By Counterparty)				Cross-Border and Foreign-Office Commitments and Guarantees		Credit Derivatives (By Reference Entity)			
Total Collateral	Of Which, Cash	Of Which, Same Country	Of Which, Resale Agreements and Securities Lending (Counterparty)	Unused Commitments	Guarantees (Excluding Credit Derivatives Sold)	Gross-Gross		Gross-Net	
						Total Credit Derivatives Purchased	Total Credit Derivatives Sold	Total Credit Derivatives Purchased	Total Credit Derivatives Sold
M870	M871	M872	M873	C936	M875	M876	M877	M878	M879
(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)

FFIEC 009a – Country Exposure Information Report

- Who must report – Every institution that submits Form FFIEC 009 and has exposures that meet the criteria below
- **Part A –**
 - Total exposures on an ultimate-risk basis to a single country excluding the United States, exceeds one percent of the banking institution’s total assets or exceed 20 percent of the banking institution’s total capital, whichever is less. All columns included in Part A should only be completed for the countries that exceed these thresholds.
 - Total Assets are those submitted on the FFIEC 031 for banks and the FR Y-9C for banking holding companies, as of the same date.
 - Total Capital includes Tier 1 plus Tier 2 Capital
 - All columns should only be completed for countries that exceed these thresholds.



FFIEC 009a – Country Exposure Information Report

- **Part A – Total Exposures on an ultimate-risk basis:**
 - For countries that exceed the thresholds, FFIEC 009 and FFIEC 009a must equal each other for the following columns:

FFIEC 009a Part A	FFIEC 009
Column 1 - Cross-border claims on an ultimate risk basis	Schedule C, Part II, Columns 1 through 5
Column 2 - Foreign-office claims on local residents	Schedule C, Part II, Columns 6 through 10
Column 3 - Gross claims outstanding from derivative products after mandated adjustments for transfer of exposure	Schedule D, Column 5



Reporting Instruction Correction Columns 6-9

Current FFIEC 009a Part A Reporting Instructions state that:	Proposed FFIEC 009a Part A Reporting Instructions clarification:
Columns 1, 2, 10 and 11 are to exclude derivative products.	Columns 1, 2, 10 and 11 are to exclude derivative products.
Columns 6 through 9 should INCLUDE derivative products.	Columns 6 through 9 should EXCLUDE derivative products.
Sum of Columns 6 through 9 should equal the sum of Columns 1 and 2, as well as the sum of Columns 10 and 11.	Sum of Columns 6 through 9 should equal the sum of Columns 1 and 2, as well as the sum of Columns 10 and 11.
Total claims from derivative products are reported in Column 3.	Total claims from derivative products are ONLY reported in Column 3.

139

FFIEC 009a – Country Exposure Information Report

- Who must report - Part B**
 - Total exposures on an ultimate-risk basis to a single country excluding the U.S. exceed 0.75 percent, but not 1 percent of the banking institution's total assets or are between 15 percent and 20 percent of the banking institution's total capital, whichever is less.
 - Report only the country codes and the aggregate amount of exposure for all countries listed.

Country Exposure Information Report
 PART B - Information on exposure (as defined in Part A, Column 4) to any country not listed in Part A, where exposure exceeds 0.75 percent but does not exceed 1 percent of the reporting institution's assets or is between 15 percent and 20 percent of its total capital, whichever is less.

Country	Country Code	Country Codes where exposures meet the reporting criteria stated for Part B
Country 1	9201	1
Country 2	9202	
Country 3	9203	
Country 4	9204	
Country 5	9205	
Country 6	9206	
Country 7	9207	
Country 8	9208	
Country 9	9209	
Country 10	9210	
Country 11	9211	
Country 12	9212	
Country 13	9213	
Country 14	9214	
Country 15	9215	
Total amount of exposure to all of the countries listed in Part B	9220	

Statement by management of the reporting institution concerning the information reported above (OPTIONAL)

140

FFIEC 009/009a – FRBNY Contacts

Contact	Title	Email	Phone Number
Henry Castillo	Director	henry.castillo@ny.frb.org	(212) 720-1318
Jamie Ferkov	Staff Manager	jamie.ferkov@ny.frb.org	(212) 720-1862
Brian Goodwin	Staff Manager	brian.goodwin@ny.frb.org	(212) 720-8316
Rob Braccia	Associate	rob.l.braccia@ny.frb.org	(212) 720-8540
Mayank Rastogi	Associate	mayank.rastogi@ny.frb.org	(212) 720-8064
Viral Patel	Associate	viral.patel@ny.frb.org	(212) 720-7861
Joe Hernandez	Sr. Analyst	joe.hernandez@ny.frb.org	(212) 720-1362

