| | Existing FICC Clearing Models | | | | | | Other Repo Clearing Models | | | | | | | | | | | Derivatives Clearing Models | | | | |
| | Sponsored Member Service | | Prime Brokerage Clearing | Correspondent Clearing | Full Service Netting Members | Centrally Cleared Institutional Triparty (CCIT) Service | LCH Repo Clear | | | Eurex Repo | | | CDCC Repo CCP | | | | | CME | | LCH | | |
	Sponsored DVP Service	Sponsored GC Service					RepoClear Member	RepoClear Dealer	Sponsored Member	General Clearing Membership	Direct Clearing Membership	ISA Direct Clearing Membership / Clearing Agents	Undisclosed Clients	Disclosed Clients	Clearing Member	Limited Clearing Member	Sponsored Member	Membership	FCM Client Clearing	SwapClear Member	SwapClear Clearing Client	FCM Client Clearing (SwapClear)
Description																		N/A (It appears that CDCC is considering expanding its clearing services to include a sponsored model, but that is not currently provided under its rules).					
Direct/Indirect (i.e., whether pre-novation counterparties are in privity with the CCP)	Direct	Direct	Indirect (for Executing Firms)	Indirect (for Executing Firms)	Direct	Direct	Direct	Indirect	Direct	Direct	Direct	Direct	Indirect	Indirect	Indirect (for clients)	Direct		Direct	Indirect	Direct	Indirect	Indirect
Mechanics of submitting transactions																						
Mechanics of posting/receiving daily margin/payments																						
Legal counterparty	Sponsored Member (Sponsoring Member acts as processing agent and guarantor)	Sponsored Member (Sponsoring Member acts as processing agent and guarantor)	Submitting Member	Submitting Member	Netting Member	CCIT Member	RepoClear Member	RepoClear Dealer	Sponsored Member	General Clearing Member	Direct Clearing Member	ISA Direct Clearing Member	Clearing Member	Clearing Member	Clearing Member	Limited Clearing Member		Clearing Member	Clearing Member as agent for the FCM Client	Clearing Member	Clearing Member	Clearing Member as agent for the FCM Client
Entity to whom CCP has recourse	Both Sponsored Member as counterparty to the cleared transaction and its Sponsoring Member (as guarantor)	Both Sponsored Member as counterparty to the cleared transaction and its Sponsoring Member (as guarantor)	Submitting Member	Submitting Member	Netting Member	CCIT Member	RepoClear Member	RepoClear Dealer	Sponsored Member	General Clearing Member	Direct Clearing Member	ISA Direct Clearing Member (and, if the Clearing Agent is a "Indemnifying Clearing Agent," the Clearing Agent)	Clearing Member	Clearing Member	Clearing Member	Limited Clearing Member		Clearing Member	Clearing Member	Clearing Member	Clearing Member	Clearing Member
Liability/obligations of intermediary (if applicable)	Sponsoring Member guarantees Sponsored Members' performance to FICC	Sponsoring Member guarantees Sponsored Members' performance to FICC	Submitting Member is responsible for all obligations to FICC in respect of trades submitted on behalf of Executing Firms.	Submitting Member is responsible for all obligations to FICC in respect of trades submitted on behalf of Executing Firms.	N/A	N/A	N/A	N/A	N/A	N/A	N/A					N/A		N/A	The clearing member is guarantor and responsible for its clients' transactions	N/A		FCM Clearing Member is responsible for all obligations owed to LCH in respect of the transactions of its FCM Clients.
Available for done away transactions (i.e., whether a customer can clear trades executed with a person other than its clearing member)?	Yes	No	Yes	Yes	N/A	N/A	N/A	Yes	N/A	N/A	N/A	Yes	Yes	Yes	Yes	Yes		Yes	Yes	N/A	Yes	Yes
Obligations to default fund/clearing fund who bears these, how are they calculated, how are they segregated and what is at risk?																						
Where is collateral held by the CCP?																						
How is initial margin (or similar) segregated?																						
Default management obligations (i.e., loss allocation/liquidity obligations) – who has these, what are they?																						

Treatment of clients upon intermediary default (if applicable)	FICC has discretion to close-out Sponsored Member Transactions or continue to settle them upon a Sponsoring Member's default. See FICC Rulebook, Section 14 of default. See FICC Rulebook, Section 14 of Rule 3A.	FICC has discretion to close out Sponsored Member Transactions or continue to settle them upon a Sponsoring Member's Rule 3A.	FICC does not have a legal relationship with Executing Firms. Upon the Submitting Member's default, FICC will close out all trades carried for the Executing Firms by the Submitting Member. Executing Firms may have SIPA customer or similar custodial claims for the return of their assets and any amounts paid by FICC.	FICC does not have a legal relationship with Executing Firms. Upon the Submitting Member's default, FICC will close out all trades carried for the Executing Firms by the Submitting Member. Executing Firms may have SIPA customer or similar custodial claims for the return of their assets and any amounts paid by FICC.	N/A	N/A	N/A	LCH will seek to port client positions and associated assets to another clearing member (the "Backup Clearing Member"). The Backup Clearing Member must accept the contracts to be ported. If porting is not achieved, LCH will close out the positions and liquidate the relevant collateral. See FICC Rulebook, Section 1.14.3(i). Clearing Clients may select a Backup Clearing Member in advance and notify LCH of this choice. Procedures, Section 28, RepoClear Service, Section 1.12.3.	Sponsored Members must appoint a "back-up" Agent Member to take over in the event of an "Agent Close-out Event," or elect to perform the services of a back-up Agent Member itself. SC Regulation 4(c).	N/A	N/A	Upon a Clearing Agent default, its ISA Direct Clearing Member may within certain period (depending on when Eurex gives notice to the ISA Direct Clearing Member) elect to (i) find a replacement Clearing Agent, (ii) become a Direct Clearing Member, if eligible, or (iii) close out its transactions. Eurex Clearing Conditions, General Provisions Chapter I, Part 6, Section 11.2.	Eurex will cease accepting new client transactions. Eurex will transfer Undisclosed Clients' transactions (including related Indirect Client's transactions) to another Clearing Member, unless (i) transfer conditions under the Eurex rules are not satisfied, or (ii) if such transfer is not permitted in the jurisdiction of the defaulting Clearing Member, in which case such client transactions would be closed out. Eurex Clearing Conditions Chapter I, Part 1, Subpart A, Section 6.1 and Subpart C, Section B, Part 4, Sections 8 and 10.	Eurex will cease accepting new client transactions. Eurex will transfer a Disclosed Direct Client's transactions (including related Indirect Client's transactions) to another Clearing Member, unless (i) the Disclosed Direct Client elects termination or does not timely elect transfer, (ii) if transfer conditions under the Eurex rules are not satisfied, or (iii) if such transfer is not permitted in the jurisdiction of the defaulting Clearing Member, in which case such client transactions would be closed out. Eurex Clearing Conditions Chapter I, Part 2, Subpart A, Section 6.1 and Subpart C, Section B, Part 4, Sections 8 and 10.	CDCC does not have a legal relationship with clients of Fixed Income Clearing Members. Upon a Fixed Income Clearing Member's default, CDCC will close out all trades carried for clients by the Fixed Income Clearing Member.	N/A		N/A	Upon a clearing member's default, CME may immediately transfer customer positions and associated performance bond value to another clearing member, or close-out the customer positions. CME Rule, Rules 802.G and 8G802.d.	N/A	LCH will seek to auction the portfolio, or a portion of the portfolio, of the SwapClear Member to another SwapClear Member, including client transactions. At any time, a SwapClear Clearing Client may select a "Backup Clearing Member" to which its contracts may be ported. Procedures, Section 2F, SwapClear Service, Sections 1.28 and 1.28.4.	LCH will seek to auction the portfolio, or a portion of the portfolio, of the FCM Clearing Member to another FCM Clearing Member, including client transactions. FCM Procedures, Section 2.1.57.
Obligations of intermediary if client defaults (if applicable)	Sponsoring Member is guarantor of Sponsored Member's performance to FICC. If so permitted under agreement between Sponsoring Member and the defaulted Sponsored Member, the Sponsoring Member can close out all of the Sponsored Member's trades and the Sponsoring Member's corresponding house trades. See FICC Rulebook, Section 18 of Rule 3A.	Sponsoring Member is guarantor of Sponsored Member's performance to FICC. If so permitted under agreement between Sponsoring Member and the defaulted Sponsored Member, the Sponsoring Member can close out all of the Sponsored Member's trades and the Sponsoring Member's corresponding house trades. See FICC Rulebook, Section 18 of Rule 3A.	Submitting Member is responsible for all obligations to FICC in respect of trades submitted on behalf of Executing Firms. There is no FICC rules permitting a Submitting Member to terminate novated trades that were submitted on behalf of Executing Firms upon an Executing Firm's default.	Submitting Member is responsible for all obligations to FICC in respect of trades submitted on behalf of Executing Firms. There is no FICC rules permitting a Submitting Member to terminate novated trades that were submitted on behalf of Executing Firms upon an Executing Firm's default.	N/A	N/A	N/A	If the RepoClear Member determines that an early termination date has occurred with respect to a client transaction, it may instruct LCH to transfer the relevant contract to its proprietary account. Procedures, Section 2B, RepoClear Service, Section 1.12.3.	An Agent Member does not guarantee its Sponsored Members' performance. However, Agent Member is responsible for posting "Agent Buffer" (i.e., collateral that LCH may apply to cover a shortfall in margin required to be posted by a Sponsored Member or default fund or Agent Resource Contribution obligations of Agent Members). SC Regulation 16. Agent Member is also required to post default fund contributions for Sponsored Member positions, as well as additional collateral known as "Agent Resource Contribution". SC Regulation 17.	N/A	N/A	Clearing Agent has no obligations except for potential additional Default Fund requirement, unless it is an Indemnifying Clearing Agent (see Row 15 above). An Indemnifying Clearing Agent is responsible for any amount necessary to cover Eurex's losses due to its ISA Direct Clearing Member's default.	If the client has been excluded or restricted from trading, the Clearing Member may terminate the trades. Eurex Clearing Conditions, Chapter I, Part 1, Section 10.5. If the Clearing Member closes out the transaction between it and its client for another reason (e.g., pursuant to a bilateral agreement), the related transaction between the Clearing Member and Eurex will not be closed out but instead credited to the Clearing Member's proprietary account. Eurex Clearing Conditions, Chapter I, Part 1, Section 10.7.	If the client has been excluded or restricted from trading, the Clearing Member may terminate the trades. Eurex Clearing Conditions, Chapter I, Part 1, Section 10.5. If the Clearing Member closes out the transaction between it and its client for another reason (e.g., pursuant to a bilateral agreement), the related transaction between the Clearing Member and Eurex will not be closed out but instead credited to the Clearing Member's proprietary account. Eurex Clearing Conditions, Chapter I, Part 1, Section 10.7.	The Fixed Income Clearing Member is responsible for all obligations to CDCC in respect of trades submitted on behalf of clients. There is no CDCC rules permitting a Fixed Income Clearing Member to terminate novated trades that were submitted on behalf of a client upon the client's default.	N/A		N/A	The clearing member is guarantor for all obligations to CME in respect of trades submitted on behalf of clients. There is no CME rule permitting a clearing member to terminate novated trades that were submitted on behalf of a client upon the client's default.	N/A	If the SwapClear Member determines that an early termination date has occurred with respect to a client transaction, it may instruct LCH to transfer the relevant contract to its proprietary account. Procedures, Section 2F, SwapClear Service, Section 1.13.1.	If the FCM Clearing Member determines that a default has occurred with respect to a client transaction, it may transfer the relevant contract to its proprietary account. FCM Procedures, Section 2.1.13.
Whether there is industry or ad hoc opinion available to address netting against U.S. Customers for U.S. Regulatory Capital purposes	Yes for Sponsoring Members (this opinion coverage is in addition to the opinion covering their proprietary activities as Netting Members; see Column F) No for Sponsored Members	Yes (note that this model only allows done with trades)	No	No	Yes	Yes	Yes	Yes	Yes	CRR Opinions are available for the UK and certain EU jurisdictions.	CRR Opinions are available for the UK and certain EU jurisdictions.	CRR Opinions are available for the UK and certain EU jurisdictions.	CRR Opinions are available for the UK and certain EU jurisdictions.	CRR Opinions are available for the UK and certain EU jurisdictions.	N/A		N/A	Yes	Yes	Yes	Yes