

**Jurisdiction: United States of America** 

- I. Refining the regulatory perimeter
- II. Hedge funds
- **III. Securitisation**
- IV. Enhancing supervision
- V. Building and implementing macroprudential frameworks and tools
- VI. Improving oversight of credit rating agencies (CRAs)
- VII. Enhancing and aligning accounting standards
- VIII. Enhancing risk management
- IX. Strengthening deposit insurance
- X. Safeguarding the integrity and efficiency of financial markets
- XI. Enhancing financial consumer protection
- XII. Reference to source of recommendations
- XIII. List of Abbreviations



| No               | Description  | G20/FSB Recommendations   | Remarks  | Progress to date   | Next steps  |
|------------------|--|---|--|--|---|
| I.               | Refining the regulator   | y perimeter   |  | , <u> </u>   |   |
| 1.<br>(1)<br>(1) | Review of the boundaries of the regulatory framework including strengthening of oversight of shadow banking <sup>1</sup> | We will each review and adapt the boundaries of the regulatory framework to keep pace with developments in the financial system and promote good practices and consistent approaches at an international level. (London)  We agree to strengthen the regulation | Jurisdictions should indicate the steps taken to expand the domestic regulatory framework to previously unregulated entities, for example, non-bank financial institutions (e.g. finance companies, mortgage insurance companies, credit hedge funds) and conduits/SIVs etc.  Jurisdictions should indicate policy | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  | Planned actions (if any): The NAIC is currently in the process of modifying the NAICs Mortgage Guaranty Insurance Model Act, including a more specific risk-based capital requirement and a possible additional loan-level cash flow model capital requirement. In December 2013, the U.S. Federal Insurance Office (FIO) issued its report on How to   |
|                  |  | and oversight of the shadow banking system. <sup>2</sup> (Cannes)   | measures to strengthen the regulation and oversight of the shadow banking system.  See, for reference, the recommendations discussed in section 2 of the October 2011 FSB report: Shadow Banking:  Strengthening Oversight and Regulation.   | Issue is being addressed through:  □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Reform effective (completed) as of: 11.04.2012  Short description of the content of the legislation/regulation/guideline: The | Modernize and Improve the System of Insurance Regulation in the United States. In the report, FIO recommended that Federal standards and oversight for mortgage insurers should be developed and implemented. Once finalized and adopted, the Federal Housing Finance Authority's (FHFA) updated Private Mortgage Insurer Eligibility Requirements will provide one counterparty risk standard for capital and business operations for mortgage insurers that wish to insure loans that are sold to Fannie Mae and Freddie Mac, the government-sponsored enterprises that purchase mortgages and package them |

Some authorities or market participants prefer to use other terms such as "market-based financing" instead of "shadow banking" is not intended to cast a pejorative tone on this system of credit intermediation. However, the FSB is using the term "shadow banking" as this is the most commonly employed and, in particular, has been used in the earlier G20 communications.

<sup>&</sup>lt;sup>2</sup> This recommendation will be retained until the monitoring framework for shadow banking, which is one of the designated priority areas under the CFIM, is established.



| No | Description | G20/FSB Recommendations | Remarks | Progress to date   | Next steps  |
|----|-------------|-------------------------|---------|--|---|
|    |             |                         |         | Financial Stability Oversight Council (FSOC) has authority to expand the U.S. regulatory perimeter by designating the  | into mortgage-backed securities.  Expected commencement date:   |
|    |             |                         |         | largest, most interconnected nonbank firms for heightened prudential standards and supervision by the Federal Reserve. Accordingly, on April 11, 2012, the FSOC published a Final Rule and Interpretive Guidance regarding the criteria and process for designating nonbank financial firms.   | Web-links to relevant documents: http://www.sec.gov/news/testimony/2012 /ts030612mls.htm http://www.sec.gov/news/speech/2012/sp ch031912ebw.htm http://www.gpo.gov/fdsys/pkg/FR-2012- 04-11/pdf/2012-8627.pdf |
|    |             |                         |         | Highlight main developments since last year's survey: As of June 2014, FSOC has designated three nonbank financial companies for Federal Reserve supervision and enhanced prudential standards. FSOC is continually considering other nonbank financial companies as part of the process described in the April 2012 rule and interpretive guidance. |   |
|    |             |                         |         | Web-links to relevant documents: http://www.sec.gov/news/testimony/2012 /ts030612mls.htm http://www.sec.gov/news/speech/2012/sp ch031912ebw.htm http://www.gpo.gov/fdsys/pkg/FR-2012- 04-11/pdf/2012-8627.pdf  |   |



| No  | Description | G20/FSB Recommendations   | Remarks   | Progress to date  | Next steps  |
|-----|-------------|---|---|---|---|
| II. | Hedge funds |   |   |   |   |
|     |             | We also firmly recommitted to work in an internationally consistent and non-discriminatory manner to strengthen regulation and supervision on hedge funds. (Seoul)  Hedge funds or their managers will be registered and will be required to disclose appropriate information on an ongoing basis to supervisors or regulators, including on their leverage, necessary for assessment of the systemic risks they pose individually or collectively. Where appropriate registration should be subject to a minimum size. They will be subject to oversight to ensure that they have adequate risk management. (London) | Jurisdictions should state whether Hedge Funds(HFs) are domiciled locally and, if available, indicate the size of the industry in terms of Assets Under Management (AUM) and number of HFs. Jurisdictions should indicate the progress made in implementing the high level principles contained in IOSCO's Report on Hedge Fund Oversight (Jun 2009).  In particular, jurisdictions should specify whether:  - HFs and/or HF managers are subject to mandatory registration  - Registered HF managers are subject to appropriate ongoing requirements regarding:  • Organisational and operational standards;  • Conflicts of interest and other conduct of business rules;  • Disclosure to investors; and | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Reform effective (completed) as of: 30/4/2013  Short description of the content of the legislation/regulation/guideline: | If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:  Planned actions (if any):  Expected commencement date:  Web-links to relevant documents: |
|     |             |   |   | Short description of the content of the legislation/regulation/guideline: Registration of hedge fund managers in  |   |
|     |             |   |   | force; data was collected from all managers by April 30 2013.  Highlight main developments since last year's survey:  |   |



USA

| No | Description | G20/FSB Recommendations | Remarks | Progress to date                        | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | Web-links to relevant documents:        |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/ia- |            |
|    |             |                         |         | 3308.pdf                                |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/ia- |            |
|    |             |                         |         | 3222.pdf                                |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/ia- |            |
|    |             |                         |         | 3221.pdf                                |            |



| No       | Description   | G20/FSB Recommendations  | Remarks   | Progress to date   | Next steps  |
|----------|---|--|---|--|---|
| No 3 (3) | Description  Establishment of international information sharing framework | G20/FSB Recommendations  We ask the FSB to develop mechanisms for cooperation and information sharing between relevant authorities in order to ensure effective oversight is maintained when a fund is located in a different jurisdiction from the manager. We will, cooperating through the FSB, develop measures that implement these principles by the end of 2009. (London) | Jurisdictions should indicate the progress made in implementing the high level principles in IOSCO's <i>Report on Hedge Fund Oversight (Jun 2009)</i> on sharing information to facilitate the oversight of globally active fund managers.  In addition, jurisdictions should state whether they are:  - Signatory to the IOSCO MMoU  - Signatory to bilateral agreements for supervisory cooperation that cover hedge funds and are aligned to the 2010 IOSCO <i>Principles Regarding Cross-border Supervisory</i> | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  | Next steps  If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:  Planned actions (if any):  Expected commencement date:  Web-links to relevant documents: |
|          |   |  | Cooperation.  In particular, jurisdictions should indicate those jurisdictions where an MoU is in place that provides for oversight when a hedge fund is located in one of these jurisdictions and manager is located elsewhere.  | SEC staff chaired an IOSCO task force that developed a model supervisory cooperation arrangement.  Status of progress:  Draft in preparation, expected publication by:  Draft published as of:  Final rule or legislation approved and will come into force on:  Reform effective (completed) as of: May 2010  Short description of the content of the legislation/regulation/guideline: Model supervisory cooperation arrangement published by IOSCO in May 2010. The |   |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                         | Next steps |
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|    |             |                         |         | SEC and several of its counterparts have |            |
|    |             |                         |         | entered into memoranda of                |            |
|    |             |                         |         | understanding (MOUs) and other           |            |
|    |             |                         |         | arrangements relating to cooperation     |            |
|    |             |                         |         | with respect to supervisory matters.     |            |
|    |             |                         |         | Highlight main developments since last   |            |
|    |             |                         |         | year's survey:                           |            |
|    |             |                         |         | Web-links to relevant documents:         |            |
|    |             |                         |         | http://www.iosco.org/library/pubdocs/pdf |            |
|    |             |                         |         | /IOSCOPD322.pdf                          |            |
|    |             |                         |         | http://www.sec.gov/about/offices/oia/oia |            |
|    |             |                         |         | _cooparrangements.shtml#reg              |            |



| No  | Description            | G20/FSB Recommendations   | Remarks  | Progress to date  | Next steps                       |
|-----|------------------------|---|--|---|----------------------------------|
| 4   | Enhancing counterparty | Supervisors should require that   | Jurisdictions should indicate specific   | ☐ Not applicable  | Planned actions (if any):        |
| (4) | risk management        | institutions which have hedge funds as their counterparties have effective risk                                   | policy measures taken for enhancing counterparty risk management and                                   | ☐ Applicable but no action envisaged at the moment  | Expected commencement date:      |
|     |                        | management, including mechanisms to monitor the funds' leverage and set limits for single counterparty exposures. | strengthening their existing guidance on<br>the management of exposure to leveraged<br>counterparties. | If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification: | Web-links to relevant documents: |
|     |                        | (London)  | In particular, jurisdictions should indicate whether they have implemented the                         | ☑ Implementation ongoing or completed :   |                                  |
|     |                        |   | Basel III rules for credit exposures to  | Issue is being addressed through:   |                                  |
|     |                        |   | highly leveraged counterparties (para 112  | ☑ Primary / Secondary legislation   |                                  |
|     |                        |   | of <u>Basel III (Jun 2011)</u> – see also <u>FAQ</u><br>no 1b.4 on Basel III counterparty credit       | ☑ Regulation / Guidelines   |                                  |
|     |                        |   | risk, Dec 2012), and principle 2.iii of IOSCO Report on Hedge Fund Oversight                           | ☑ Other actions (such as supervisory actions), please specify:  |                                  |
|     |                        |   | (Jun 2009). Jurisdictions should also  | Status of progress :  |                                  |
|     |                        |   | indicate the steps they are taking to implement the new standards on equity                            | ☐ Draft in preparation, expected publication by:  |                                  |
|     |                        |   | exposures (Capital requirements for  | ☐ Draft published as of:  |                                  |
|     |                        |   | banks' equity investments in funds, Dec 2013) by 1 January 2017.                                       | ☐ Final rule or legislation approved and will come into force on:   |                                  |
|     |                        |   | For further reference, see also the  | ☑ Reform effective (completed) as of: 01.06.2011  |                                  |
|     |                        |   | following documents:   | Short description of the content of the   |                                  |
| (4) |                        | Supervisors will strengthen their existing  | • BCBS <u>Sound Practices for Banks'</u>   | legislation/ regulation/guideline: The  |                                  |
|     |                        | guidance on the management of   | Interactions with Highly Leveraged   | Dodd-Frank Act generally requires all   |                                  |
|     |                        | exposures to leveraged counterparties.  | Institutions (Jan 1999)  | advisers to hedge funds (and other  |                                  |
|     |                        | (Rec. II.17,FSF 2008)   | BCBS Banks' Interactions with  | private pools of capital, including private   |                                  |
|     |                        |   | Highly Leveraged Institutions (Jan   | equity funds) whose assets under  |                                  |
|     |                        |   | <u>1999)</u>   | management exceed \$100 million to  |                                  |
|     |                        |   |  | register with the SEC. The SEC has  |                                  |
|     |                        |   |  | completed the required rulemaking (see  |                                  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                          | Next steps |
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|    |             |                         |         | links below). In addition, in accordance  |            |
|    |             |                         |         | with Dodd-Frank, pursuant to the          |            |
|    |             |                         |         | Securities Exchange Act of 1934           |            |
|    |             |                         |         | ("Exchange Act"), the SEC proposed, in    |            |
|    |             |                         |         | November 2012, capital and margin         |            |
|    |             |                         |         | requirements for security-based swap      |            |
|    |             |                         |         | dealers ("SBSDs") and major security-     |            |
|    |             |                         |         | based swap participants ("MSBSPs"),       |            |
|    |             |                         |         | segregation requirements for SBSDs, and   |            |
|    |             |                         |         | notification requirements with respect to |            |
|    |             |                         |         | segregation for SBSDs and MSBSPs. In      |            |
|    |             |                         |         | particular, these proposals would require |            |
|    |             |                         |         | SBSDs and MSBSPs to collect margin        |            |
|    |             |                         |         | from counterparties such as hedge funds.  |            |
|    |             |                         |         | These requirements are modelled on        |            |
|    |             |                         |         | existing margin requirements for broker-  |            |
|    |             |                         |         | dealers. The SEC's proposal would also    |            |
|    |             |                         |         | increase the minimum net capital          |            |
|    |             |                         |         | requirements for broker-dealers           |            |
|    |             |                         |         | permitted to use the alternative internal |            |
|    |             |                         |         | model-based method for computing net      |            |
|    |             |                         |         | capital ("ANC broker-dealers"). See       |            |
|    |             |                         |         | Capital, Margin, and Segregation          |            |
|    |             |                         |         | Requirements for Security-Based Swap      |            |
|    |             |                         |         | Dealers and Major Security-Based Swap     |            |
|    |             |                         |         | Participants and Capital Requirements     |            |
|    |             |                         |         | for Broker-Dealers, Exchange Act          |            |
|    |             |                         |         | Release No. 68071 (Oct. 18, 2012), 77     |            |
|    |             |                         |         | FR 70213 (Nov. 23, 2012). Further, the    |            |
|    |             |                         |         | following SEC regulations have            |            |



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|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | implemented these recommendations: •        |            |
|    |             |                         |         | Exchange Act Rule 15c3-4 requires that      |            |
|    |             |                         |         | OTC derivatives dealers establish,          |            |
|    |             |                         |         | document, and maintain a system of          |            |
|    |             |                         |         | internal risk management controls to        |            |
|    |             |                         |         | assist it in managing the risks associated  |            |
|    |             |                         |         | with its business activities, including     |            |
|    |             |                         |         | market, credit, leverage, liquidity, legal, |            |
|    |             |                         |         | and operational risks. • Appendix E to      |            |
|    |             |                         |         | Rule 15c3-1 Deductions for Market           |            |
|    |             |                         |         | and Credit Risk for Certain Brokers or      |            |
|    |             |                         |         | Dealers, provides that any broker dealer    |            |
|    |             |                         |         | that uses the "alternative method for       |            |
|    |             |                         |         | calculating net capital" (permits a broker- |            |
|    |             |                         |         | dealer to use mathematical models to        |            |
|    |             |                         |         | calculate net capital requirements for      |            |
|    |             |                         |         | market and derivatives-related credit       |            |
|    |             |                         |         | risk) is subject to enhanced net capital,   |            |
|    |             |                         |         | early warning, recordkeeping, reporting,    |            |
|    |             |                         |         | and certain other requirements, and must    |            |
|    |             |                         |         | implement and document an internal risk     |            |
|    |             |                         |         | management system. • Appendix F to          |            |
|    |             |                         |         | Rule 15c3-1 Optional Market and             |            |
|    |             |                         |         | Credit Risk Requirements for OTC            |            |
|    |             |                         |         | Derivatives Dealers, provides that an       |            |
|    |             |                         |         | OTC derivatives dealer shall provide a      |            |
|    |             |                         |         | comprehensive description of its internal   |            |
|    |             |                         |         | risk management control systems and         |            |
|    |             |                         |         | how those systems adhere to the             |            |
|    |             |                         |         | requirements set forth in Rule 15c3-4(a)    |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                        | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | through (d).                            |            |
|    |             |                         |         | Highlight main developments since last  |            |
|    |             |                         |         | year's survey:                          |            |
|    |             |                         |         | Web-links to relevant documents:        |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/ia- |            |
|    |             |                         |         | 3222.pdf                                |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/ia- |            |
|    |             |                         |         | 3221.pdf                                |            |
|    |             |                         |         | http://www.sec.gov/rules/proposed/2012/ |            |
|    |             |                         |         | 34-68071.pdf http://www.ecfr.gov/cgi-   |            |
|    |             |                         |         | bin/text-                               |            |
|    |             |                         |         | idx?c=ecfr&SID=81eedd5ca275d84f5eaf     |            |
|    |             |                         |         | 694af12003be&rgn=div8&view=text&n       |            |
|    |             |                         |         | ode=17:3.0.1.1.1.2.95.334&idno=17       |            |
|    |             |                         |         | http://www.ecfr.gov/cgi-bin/text-       |            |
|    |             |                         |         | idx?c=ecfr&SID=81eedd5ca275d84f5eaf     |            |
|    |             |                         |         | 694af12003be&rgn=div8&view=text&n       |            |
|    |             |                         |         | ode=17:3.0.1.1.1.2.95.328&idno=17       |            |
|    |             |                         |         | http://www.ecfr.gov/cgi-bin/text-       |            |
|    |             |                         |         | idx?c=ecfr&SID=81eedd5ca275d84f5eaf     |            |
|    |             |                         |         | 694af12003be&rgn=div8&view=text&n       |            |
|    |             |                         |         | ode=17:3.0.1.1.1.2.95.329&idno=17       |            |



|                   | During 2010, supervisors and regulators will:  • implement IOSCO's proposals to strengthen practices in securitisation  | Jurisdictions should indicate the progress made in implementing the recommendations contained in:   | ☐ Not applicable ☐ Applicable but no action envisaged at the moment   | If this recommendation has not yet been fully implemented, please provide   |
|-------------------|---|---|---|---|
| (5) management of | <ul><li>will:</li><li>implement IOSCO's proposals to<br/>strengthen practices in securitisation</li></ul>   | made in implementing the  | ☐ Applicable but no action envisaged at   | been fully implemented, please provide  |
|                   | markets. (FSB 2009)  The BCBS and authorities should take forward work on improving incentives for risk management of securitisation, including considering due diligence and quantitative retention requirements by 2010. (London)  Securitization sponsors or originators should retain a part of the risk of the underlying assets, thus encouraging them to act prudently. (Pittsburgh) | <ul> <li>IOSCO's <u>Unregulated Financial</u> <u>Markets and Products (Sep 2009)</u>, including justification for any exemptions to the IOSCO recommendations; and</li> <li>BCBS's Basel 2.5 standards on exposures to securitisations (Jul 2009), <a href="http://www.bis.org/publ/bcbs157.pdf">http://www.bis.org/publ/bcbs157.pdf</a> and <a href="http://www.bis.org/publ/bcbs158.pdf">http://www.bis.org/publ/bcbs158.pdf</a>.</li> <li>Jurisdictions may also indicate progress in implementing the recommendations of the IOSCO's <u>Report on Global</u> <u>Developments in Securitisation</u> <u>Regulation (Nov 2012)</u>.<sup>3</sup></li> </ul> | If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification:  ☑ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation ☑ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: ☑ Reform effective (completed) as of: 20.01.2011 | reasons for delayed implementation:  Planned actions (if any):  Expected commencement date:  Web-links to relevant documents: |

<sup>&</sup>lt;sup>3</sup> Jurisdictions should not provide responses on IOSCO recommendations concerning the alignment incentives associated with securitisation (including risk retention requirements) since these will be covered by an IOSCO peer review in 2014.



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                          | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | "Disclosure for ABS Required by           |            |
|    |             |                         |         | Section 943 of the Dodd-Frank Act" and    |            |
|    |             |                         |         | "Issuer Review of Assets and Offerings    |            |
|    |             |                         |         | of ABS". In July 2013 the federal         |            |
|    |             |                         |         | banking agencies issued rules that update |            |
|    |             |                         |         | the regulatory capital framework and      |            |
|    |             |                         |         | implement, among other standards, the     |            |
|    |             |                         |         | BCBS' Basel 2.5 standards on exposures    |            |
|    |             |                         |         | to securitisations. The Federal banking   |            |
|    |             |                         |         | agencies also implemented the BCBS'       |            |
|    |             |                         |         | Basel 2.5 standards as part of the market |            |
|    |             |                         |         | risk final rule issued in June 2012.      |            |
|    |             |                         |         | Highlight main developments since last    |            |
|    |             |                         |         | year's survey:                            |            |
|    |             |                         |         | Web-links to relevant documents: Risk     |            |
|    |             |                         |         | Retention:                                |            |
|    |             |                         |         | http://www.federalreserve.gov/newseven    |            |
|    |             |                         |         | ts/press/bcreg/bcreg20130828a1.pdf        |            |
|    |             |                         |         | Regulatory capital Final Rules (OCC and   |            |
|    |             |                         |         | Federal Reserve):                         |            |
|    |             |                         |         | http://www.federalreserve.gov/newseven    |            |
|    |             |                         |         | ts/press/bcreg/20130702a.htm;             |            |
|    |             |                         |         | http://www.occ.gov/news-                  |            |
|    |             |                         |         | issuances/news-releases/2013/nr-occ-      |            |
|    |             |                         |         | 2013-110.html Regulatory capital          |            |
|    |             |                         |         | interim final rule (FDIC):                |            |
|    |             |                         |         | http://www.fdic.gov/news/news/press/20    |            |
|    |             |                         |         | 13/pr13060.html Market risk final rule:   |            |
|    |             |                         |         | http://www.gpo.gov/fdsys/pkg/FR-2012-     |            |
|    |             |                         |         | 08-30/pdf/2012-16759.pdf Jan. 20,         |            |

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| No | Description | G20/FSB Recommendations | Remarks | Progress to date                         | Next steps |
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|    |             |                         |         | 2011 Final Rules:                        |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/33-  |            |
|    |             |                         |         | 9175.pdf (Section 943 Rules) and         |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/33-  |            |
|    |             |                         |         | 9176.pdf (Issuer review of assets in ABS |            |
|    |             |                         |         | offerings)                               |            |



| No       | Description  | G20/FSB Recommendations  | Remarks  | Progress to date   | Next steps   |
|----------|--|--|--|--|--|
| 6<br>(6) | Description  Strengthening of regulatory and capital framework for monolines | G20/FSB Recommendations  Insurance supervisors should strengthen the regulatory and capital framework for monoline insurers in relation to structured credit. (Rec II.8 ,FSF 2008) | Jurisdictions should indicate the policy measures taken for strengthening the regulatory and capital framework for monolines.  See, for reference, the following principles issued by IAIS:  | ✓ Not applicable  ☐ Applicable but no action envisaged at the moment  If "Not applicable "or "Applicable but no action envisaged …" has been selected, please provide a brief  | Next steps  Planned actions (if any): State insurance regulators continue to closely monitor the financial guaranty insurers. Given the current scrutiny, inactivity in the insurance of structured products, and the significant market contraction in traditional bond insurance, there are no   |
|          |  |  | <ul> <li>ICP 13 – Reinsurance and Other Forms of Risk Transfer;</li> <li>ICP 15 – Investments; and</li> <li>ICP 17 - Capital Adequacy.</li> <li>Jurisdictions may also refer to:</li> <li>IAIS Guidance paper on enterprise risk management for capital adequacy and solvency purposes (Oct 2008).</li> <li>Joint Forum's consultative document on Mortgage insurance: market structure, underwriting cycle and policy implications (Feb 2013).</li> </ul> | Insurance Department issued Circular Letter No. 19, which updated the oversight of financial guaranty insurers. In addition, the companies are subject to increased monitoring and supervision. The New York State Insurance Department keeps other relevant state insurance regulators current on the solvency of financial guaranty insurers. However, the financial guaranty market has contracted such that among the legacy companies, only the insurance subsidiaries of Assured Guaranty Ltd. remain active writers, in addition to Build America Mutual Assurance Company, which was launched in 2012. | additional legislative or regulatory changes anticipated at this time at the state level. Certain credit stress, thin pricing, and the market contraction challenge the viability of the financial guaranty market. In December 2013, FIO issued its report on How to Modernize and Improve the System of Insurance Regulation in the United States. In the report, FIO recommended that Federal standards and oversight for mortgage insurers should be developed and implemented.  Expected commencement date: |
|          |  |  |  | ☐ Implementation ongoing or completed:  Issue is being addressed through: ☐ Primary / Secondary legislation ☐ Regulation / Guidelines ☐ Other actions (such as supervisory   | Web-links to relevant documents:   |



USA

| No | Description | G20/FSB Recommendations | Remarks | Progress to date  | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | actions), please specify:   |            |
|    |             |                         |         | Status of progress :  |            |
|    |             |                         |         | ☐ Draft in preparation, expected publication by:                          |            |
|    |             |                         |         | ☐ Draft published as of:  |            |
|    |             |                         |         | ☐ Final rule or legislation approved and will come into force on:         |            |
|    |             |                         |         | ☐ Reform effective (completed) as of:                                     |            |
|    |             |                         |         | Short description of the content of the legislation/regulation/guideline: |            |
|    |             |                         |         | Highlight main developments since last                                    |            |
|    |             |                         |         | year's survey:  |            |
|    |             |                         |         | Web-links to relevant documents:  |            |



| No       | Description   | G20/FSB Recommendations  | Remarks   | Progress to date   | Next steps  |
|----------|---|--|---|--|---|
| No 7 (7) | Description Strengthening of supervisory requirements or best practices for investment in structured products | Regulators of institutional investors should strengthen the requirements or best practices for firms' processes for investment in structured products. (Rec II.18 ,FSF 2008) | Remarks  Jurisdictions should indicate the due diligence policies, procedures and practices applicable for investment managers when investing in structured finance instruments and other policy measures taken for strengthening best practices for investment in structured finance product.  Jurisdictions may reference IOSCO's report on Good Practices in Relation to Investment Managers' Due Diligence When Investing in Structured Finance Instruments (Jul 2009).  Jurisdictions may also refer to the Joint Forum report on Credit Risk Transfer-Developments from 2005-2007 (Jul 2008). | Progress to date  □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable "or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  The NAIC has changed the process by which NAIC designations are assigned for each structured security held by an insurance company. This was an important change as NAIC designations are mapped to Risk-Based Capital factors and Asset Valuation Reserve requirements. Each RMBS and CMBS is modeled on an annual basis, using current economic and market assumptions under different scenarios to determine a probability and magnitude of loss. These are used, together with each company's carrying | If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:  Planned actions (if any): The NAIC is engaged in a wholesale review of asset risk factors for all of the investment schedules. This is expected to result in recommendations for significant changes in some areas, while others will likely remain unchanged; depending on the results of detailed analysis as balanced by the need to focus on regulatory benefits. For the largest asset class among insurers – bonds – a probable outcome is increased granularity along with an updating of risk-based capital factors based on more current default and loss severity data.  Expected commencement date:  Web-links to relevant documents: |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date  | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | determine the NAIC designation and                                |            |
|    |             |                         |         | resulting RBC factor. For other                                   |            |
|    |             |                         |         | structured securities, ratings and                                |            |
|    |             |                         |         | carrying values are used to determine                             |            |
|    |             |                         |         | the NAIC designation. The new process                             |            |
|    |             |                         |         | provides for an increased level of                                |            |
|    |             |                         |         | regulatory oversight and results in a                             |            |
|    |             |                         |         | more accurate assessment of insurance                             |            |
|    |             |                         |         | companies' investment risks. In                                   |            |
|    |             |                         |         | addition, the NAIC has increased its                              |            |
|    |             |                         |         | ongoing review of industry-wide                                   |            |
|    |             |                         |         | exposures and reports on that to various                          |            |
|    |             |                         |         | regulatory groups within the NAIC.                                |            |
|    |             |                         |         | Status of progress :  |            |
|    |             |                         |         | ☑ Draft in preparation, expected publication by:                  |            |
|    |             |                         |         | ☐ Draft published as of:  |            |
|    |             |                         |         | ☐ Final rule or legislation approved and will come into force on: |            |
|    |             |                         |         | ☐ Reform effective (completed) as of:                             |            |
|    |             |                         |         | Short description of the content of the                           |            |
|    |             |                         |         | legislation/ regulation/guideline:                                |            |
|    |             |                         |         | Highlight main developments since last                            |            |
|    |             |                         |         | year's survey:  |            |
|    |             |                         |         | Web-links to relevant documents:                                  |            |



| No  | Description            | G20/FSB Recommendations   | Remarks   | Progress to date                                   | Next steps  |
|-----|------------------------|---|---|--|---|
| 8   | Enhanced disclosure of | Securities market regulators should work  | Jurisdictions should indicate the policy  | ☐ Not applicable                                   | If this recommendation has not yet  |
| (8) | securitised products   | with market participants to expand information on securitised products and                      | measures taken for enhancing disclosure of securitised products.  | ☐ Applicable but no action envisaged at the moment | been fully implemented, please provide reasons for delayed implementation:  |
|     |                        | information on securitised products and their underlying assets. (Rec. III.10-III.13, FSF 2008) | of securitised products.  See, for reference, IOSCO's Report on Principles for Ongoing Disclosure for Asset-Backed Securities (Nov 2012) and IOSCO's Disclosure Principles for Public Offerings and Listings of Asset-Backed Securities (Apr 2010). |  | Planned actions (if any): July 26, 2011 re-proposal - comment period originally ended Oct. 4, 2011; comment period reopened on February 25, 2014 with respect to a portion of the re-proposal (dissemination of asset-level data), ending April 28, 2014; final rules pending.  Expected commencement date:  Web-links to relevant documents: |
|     |                        |   |   | Highlight main developments since last             |   |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                        | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | year's survey:                          |            |
|    |             |                         |         | Web-links to relevant documents: Jan.   |            |
|    |             |                         |         | 20, 2011 Final Rules:                   |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/33- |            |
|    |             |                         |         | 9175.pdf (Section 943) and              |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/33- |            |
|    |             |                         |         | 9176.pdf (Issuer review of assets in    |            |
|    |             |                         |         | ABS offerings) July 26, 2011 Proposed   |            |
|    |             |                         |         | Rules:                                  |            |
|    |             |                         |         | http://www.sec.gov/rules/proposed/2010/ |            |
|    |             |                         |         | 33-9117.pdf (Asset-backed securities)   |            |
|    |             |                         |         | and                                     |            |
|    |             |                         |         | http://www.sec.gov/rules/proposed/2011/ |            |
|    |             |                         |         | 33-9244.pdf (Re-proposal of shelf       |            |
|    |             |                         |         | eligibility conditions for asset-backed |            |
|    |             |                         |         | securities)                             |            |



| No    | Description                  | G20/FSB Recommendations  | Remarks  | Progress to date  | Next steps                            |
|-------|------------------------------|--|--|---|---------------------------------------|
| IV.   | <b>Enhancing supervision</b> | 1  |  |   |                                       |
| 9 (9) | Consistent,                  | All firms whose failure could pose a risk  | Jurisdictions should indicate the policy                                 | ☐ Not applicable  | Planned actions (if any):             |
|       | consolidated supervision and | to financial stability must be subject to consistent, consolidated supervision and | measures taken for implementing consistent, consolidated supervision and | ☐ Applicable but no action envisaged at the moment                            | Expected commencement date:           |
|       | regulation of SIFIs          | regulation with high standards.  | regulation of SIFIs. <sup>4</sup>  | If "Not applicable " or "Applicable but                                       | · · · · · · · · · · · · · · · · · · · |
|       |                              | (Pittsburgh)   | See, for reference, the following documents:                             | no action envisaged" has been selected, please provide a brief justification: | Web-links to relevant documents:      |
|       |                              |  | BCBS:  • Framework for G-SIBs (Nov 2011)                                 | ☑ Implementation ongoing or completed:  |                                       |
|       |                              |  | • Framework for D-SIBs (Oct 2012)  | Issue is being addressed through:   |                                       |
|       |                              |  |  | ☑ Primary / Secondary legislation   |                                       |
|       |                              |  | • <u>BCP 12 (Sep 2012)</u>   | ☐ Regulation / Guidelines   |                                       |
|       |                              |  | IAIS:  • Global Systemically Important                                   | ☑ Other actions (such as supervisory actions), please specify: See below      |                                       |
|       |                              |  | Insurers: Policy Measures (Jul 2013)                                     | Status of progress :  |                                       |
|       |                              |  | • ICP 23– Group wide supervision   | ☐ Draft in preparation, expected publication by:                              |                                       |
|       |                              |  | FSB:   | ☐ Draft published as of:  |                                       |
|       |                              |  | Framework for addressing SIFIs (Nov 2011)                                | ☑ Final rule or legislation approved and will come into force on: end-2014    |                                       |
|       |                              |  |  | ☐ Reform effective (completed) as of:   |                                       |
|       |                              |  |  | Short description of the content of the                                       |                                       |
|       |                              |  |  | legislation/ regulation/guideline: The  |                                       |
|       |                              |  |  | Dodd-Frank Act modifies U.S. regulatory                                       |                                       |
|       |                              |  |  | framework by creating the FSOC, chaired                                       |                                       |

<sup>&</sup>lt;sup>4</sup> The scope of the follow-up to this recommendation will be revised once the monitoring framework on policy measures for G-SIFIs, which is one of the designated priority areas under the CFIM, is established.



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | by the Secretary of the Treasury, with the  |            |
|    |             |                         |         | authority to designate nonbank financial    |            |
|    |             |                         |         | firms whose material financial distress or  |            |
|    |             |                         |         | composition could threaten the financial    |            |
|    |             |                         |         | stability of the United States' and to      |            |
|    |             |                         |         | require these firms be subject to           |            |
|    |             |                         |         | prudential standards and supervision by     |            |
|    |             |                         |         | the Federal Reserve. The final rule and     |            |
|    |             |                         |         | interpretative guidance noted above         |            |
|    |             |                         |         | pertains to the authority to designate.     |            |
|    |             |                         |         | Following the financial crisis, the OCC     |            |
|    |             |                         |         | developed as part of its supervisory        |            |
|    |             |                         |         | process a set of "heightened                |            |
|    |             |                         |         | expectations" to strengthen the             |            |
|    |             |                         |         | governance and risk management              |            |
|    |             |                         |         | practices of large national banks and       |            |
|    |             |                         |         | federal savings associations and to         |            |
|    |             |                         |         | enhance the agency's supervision of those   |            |
|    |             |                         |         | institutions. The program emphasised        |            |
|    |             |                         |         | strong internal control and audit functions |            |
|    |             |                         |         | and the responsibility of boards to present |            |
|    |             |                         |         | a credible challenge to management.         |            |
|    |             |                         |         | Highlight main developments since last      |            |
|    |             |                         |         | year's survey: As of June 2014, FSOC        |            |
|    |             |                         |         | has designated three nonbank financial      |            |
|    |             |                         |         | companies for Federal Reserve               |            |
|    |             |                         |         | supervision and enhanced prudential         |            |
|    |             |                         |         | standards. FSOC is continually              |            |
|    |             |                         |         | considering other nonbank financial         |            |
|    |             |                         |         | companies as part of the process            |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date  | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | described in the April 2012 rule and  |            |
|    |             |                         |         | interpretive guidance. AIG, Prudential  |            |
|    |             |                         |         | and GECC have been designated as non-   |            |
|    |             |                         |         | bank systemically important firms and are   |            |
|    |             |                         |         | regulated by the Federal Reserve. The   |            |
|    |             |                         |         | Federal Reserve is using SR 12-17 as the  |            |
|    |             |                         |         | basis for the supervision of these firms.   |            |
|    |             |                         |         | The FRS is currently working to tailor  |            |
|    |             |                         |         | supervisory practices and regulations (for  |            |
|    |             |                         |         | example, for liquidity, capital and   |            |
|    |             |                         |         | enhanced prudential standards) for these  |            |
|    |             |                         |         | non-bank systemically important firms.  |            |
|    |             |                         |         | On September 11, 2014, the OCC issued   |            |
|    |             |                         |         | formal guidelines to make the standards   |            |
|    |             |                         |         | of its Heightened Expectations program  |            |
|    |             |                         |         | enforceable on institutions with total  |            |
|    |             |                         |         | assets of \$50 billion or more. The   |            |
|    |             |                         |         | Heightened Standards guidelines set forth   |            |
|    |             |                         |         | the minimum standards for the design and  |            |
|    |             |                         |         | implementation of an institution's risk   |            |
|    |             |                         |         | governance framework and provide  |            |
|    |             |                         |         | minimum standards for oversight of that   |            |
|    |             |                         |         | framework by the board of directors."   |            |
|    |             |                         |         | The new standards become effective  |            |
|    |             |                         |         | November 10, 2014.  |            |
|    |             |                         |         | Web-links to relevant documents:<br>http://www.treasury.gov/initiatives/fsoc/<br>Documents/Nonbank%20Designations%<br>20-<br>%20Final%20Rule%20and%20Guidance.<br>pdf |            |



| No   | Description          | G20/FSB Recommendations                     | Remarks   | Progress to date                         | Next steps                             |
|------|----------------------|---|---|--|--|
| 10   | Establishing         | To establish the remaining supervisory      | Reporting in this area should be  | ☐ Not applicable                         | If this recommendation has not yet     |
| (10) | supervisory colleges | colleges for significant cross-border firms | undertaken solely by home jurisdictions                                   | ☐ Applicable but no action envisaged at  | been fully implemented, please provide |
| (10) | and conducting risk  | by June 2009. (London)                      | of significant cross-border firms. Please                                 | the moment                               | reasons for delayed implementation:    |
|      | assessments          |   | indicate whether supervisory colleges for                                 | If " Not applicable " or "Applicable but |  |
|      |                      |   | all significant cross-border firms (both                                  | no action envisaged" has been            | Planned actions (if any):              |
|      |                      |   | banks and insurance companies) have                                       | selected, please provide a brief         |  |
| (10) |                      | We agreed to conduct rigorous risk          | been established and whether the  | justification:                           | F                                      |
|      |                      | assessment on these firms [G-SIFIs]         | supervisory colleges for G-SIFIs are                                      | ☑ Implementation ongoing or              | Expected commencement date:            |
|      |                      | through international supervisory           | conducting rigorous risk assessments.                                     | completed :                              |  |
|      |                      | colleges. (Seoul)                           | Principle 13 of BCBS <u>Core Principles for</u>                           | Issue is being addressed through:        | Web-links to relevant documents:       |
|      |                      |   | Effective Banking Supervision and Good                                    | ☐ Primary / Secondary legislation        |  |
|      |                      |   | practice principles on supervisory  | ☐ Regulation / Guidelines                |  |
|      |                      |   | colleges (Oct 2010) may be used as a guide for supervisor to indicate the | ☑ Other actions (such as supervisory     |  |
|      |                      |   | implementation progress. For further                                      | actions), please specify:                |  |
|      |                      |   | reference, see the following documents:                                   | Supervisory colleges for significant     |  |
|      |                      |   |   | U.S. cross-border banking and            |  |
|      |                      |   | BCBS:   | insurance firms have been established    |  |
|      |                      |   | • Core Principles for Effective Banking                                   | and in-person as well as conference call |  |
|      |                      |   | Supervision (Sep 2012)  | meetings are held regularly. The         |  |
|      |                      |   | IAIS:   | colleges provide a framework for the     |  |
|      |                      |   |   | exchange of information regarding risk   |  |
|      |                      |   | • <u>ICP 25 and Guidance 25.1.1 – 25.1.6</u>                              | assessments. Crisis Management Group     |  |
|      |                      |   | on establishment of supervisory   | (CMG) meetings to discuss crisis         |  |
|      |                      |   | <u>colleges</u>   | management, recovery and resolution      |  |
|      |                      |   | • Guidance 25.6.20 and 25.8.16 on risk                                    | planning have been held for all eight    |  |
|      |                      |   | assessments by supervisory colleges                                       | U.S. G-SIFIs. With the exception of the  |  |
|      |                      |   | IOSCO:  | CMG for Wells Fargo, where there are     |  |
|      |                      |   |   | no identified host authority members,    |  |
|      |                      |   | Principles Regarding Cross-Border   | these meetings have included             |  |



| No | Description | G20/FSB Recommendations | Remarks                            | Progress to date  | Next steps |
|----|-------------|-------------------------|------------------------------------|---|------------|
|    |             |                         | Supervisory Cooperation (May 2010) | significant host supervisor                                       |            |
|    |             |                         |                                    | participation.  |            |
|    |             |                         |                                    | Status of progress :  |            |
|    |             |                         |                                    | ☐ Draft in preparation, expected publication by:                  |            |
|    |             |                         |                                    | ☐ Draft published as of:  |            |
|    |             |                         |                                    | ☐ Final rule or legislation approved and will come into force on: |            |
|    |             |                         |                                    | ☑ Reform effective (completed) as of:<br>Oct 2012                 |            |
|    |             |                         |                                    | Short description of the content of the                           |            |
|    |             |                         |                                    | legislation/ regulation/guideline:                                |            |
|    |             |                         |                                    | Highlight main developments since last                            |            |
|    |             |                         |                                    | year's survey: This year, the US                                  |            |
|    |             |                         |                                    | established universal colleges for JPMC                           |            |
|    |             |                         |                                    | and Citi. The core colleges will begin to                         |            |
|    |             |                         |                                    | meet on a semi-annual basis. An in-                               |            |
|    |             |                         |                                    | person CMG meeting for seven U.S.                                 |            |
|    |             |                         |                                    | GSIFIs was held in New York on October                            |            |
|    |             |                         |                                    | 15-16, 2013. The CMG meeting for                                  |            |
|    |             |                         |                                    | Wells Fargo occurred on April 7, 2014.                            |            |
|    |             |                         |                                    | The CMG for AIG met in October 2014                               |            |
|    |             |                         |                                    | and the CMG for Prudential will meet in                           |            |
|    |             |                         |                                    | the fourth quarter of 2014. State                                 |            |
|    |             |                         |                                    | Insurance Regulators of material                                  |            |
|    |             |                         |                                    | regulated entities attend CMG's for AIG                           |            |
|    |             |                         |                                    | and Prudential, in addition to FIO and the                        |            |
|    |             |                         |                                    | FRB. State regulators have established                            |            |
|    |             |                         |                                    | supervisory colleges for all the major                            |            |
|    |             |                         |                                    | internationally active insurance groups or                        |            |



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| No | Description | G20/FSB Recommendations | Remarks | Progress to date                 | Next steps |
|----|-------------|-------------------------|---------|----------------------------------|------------|
|    |             |                         |         | (IAIGs) as defined by the IAIS.  |            |
|    |             |                         |         | Web-links to relevant documents: |            |



| No   | Description                     | G20/FSB Recommendations   | Remarks   | Progress to date   | Next steps                       |
|------|---------------------------------|---|---|--|----------------------------------|
| 11   | Supervisory exchange            | To quicken supervisory responsiveness to  | Jurisdictions should include any feedback   | ☐ Not applicable   | Planned actions (if any):        |
| (11) | of information and coordination | developments that have a common effect across a number of institutions, supervisory exchange of information and                               | received from recent FSAPs/ROSC assessments on the <u>September 2012</u> BCP 3 (Cooperation and collaboration) and BCP  | ☐ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but  | Expected commencement date:      |
|      |                                 | coordination in the development of best practice benchmarks should be improved at both national and international levels. (Rec V.7, FSF 2008) | 14 (Home-host relationships).  Jurisdictions should also indicate any steps taken since the last assessment in this area, particularly in response to relevant FSAP/ROSC recommendations.                                 | no action envisaged" has been selected, please provide a brief justification:  Implementation ongoing or   | Web-links to relevant documents: |
|      |                                 |   |   | completed :  Issue is being addressed through :  |                                  |
| (11) |                                 | Enhance the effectiveness of core supervisory colleges. (FSB 2012)  | Jurisdictions should describe any regulatory, supervisory or legislative changes that will contribute to the sharing of supervisory information (e.g. within supervisory colleges or via bilateral or multilateral MoUs). | □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  Supervisors are exchanging information and improving coordination in a number of ways, e.g., through supervisory colleges and through participation in all of the major international efforts to improve supervisory responses to developments that have a common effect across a number of institutions. IOSCO members, including the SEC, also continue to develop bilateral supervisory MOUs in accordance with IOSCO's Principles for Supervisory Cooperation. U.S. agencies involved in Financial Stability Board (FSB) |                                  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date  | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | workstreams continue to work through                              |            |
|    |             |                         |         | CMGs, information sharing and cross-                              |            |
|    |             |                         |         | border cooperation agreements, and                                |            |
|    |             |                         |         | memoranda of understanding in                                     |            |
|    |             |                         |         | accordance with the timelines                                     |            |
|    |             |                         |         | established by the FSB's Cross-border                             |            |
|    |             |                         |         | Crisis Management group and the                                   |            |
|    |             |                         |         | Resolution Steering Committee to share                            |            |
|    |             |                         |         | information and develop best practices                            |            |
|    |             |                         |         | for resolution.   |            |
|    |             |                         |         | Status of progress :  |            |
|    |             |                         |         | ☐ Draft in preparation, expected publication by:                  |            |
|    |             |                         |         | ☐ Draft published as of:  |            |
|    |             |                         |         | ☐ Final rule or legislation approved and will come into force on: |            |
|    |             |                         |         | ☑ Reform effective (completed) as of: July 2010                   |            |
|    |             |                         |         | Short description of the content of the                           |            |
|    |             |                         |         | legislation/ regulation/guideline:                                |            |
|    |             |                         |         | Highlight main developments since last                            |            |
|    |             |                         |         | year's survey:  |            |
|    |             |                         |         |   |            |
|    |             |                         |         | Web-links to relevant documents:                                  |            |



| No   | Description             | G20/FSB Recommendations  | Remarks                                    | Progress to date | Next steps |
|------|-------------------------|--|--|------------------|------------|
| 12   | Strengthening resources | We agreed that supervisors should have   | No information on this recommendation      |                  |            |
| (12) | and effective           | strong and unambiguous mandates,   | will be collected in the current IMN       |                  |            |
|      | supervision             | sufficient independence to act,  | survey since a peer review is taking place |                  |            |
|      |                         | appropriate resources, and a full suite of                                       | in this area during 2014.                  |                  |            |
|      |                         | tools and powers to proactively identify   |  |                  |            |
|      |                         | and address risks, including regular stress                                      |  |                  |            |
|      |                         | testing and early intervention. (Seoul)  |  |                  |            |
|      |                         |  |  |                  |            |
| (12) |                         | Cymaryigarg ghayld gae that thay have the  |  |                  |            |
| (12) |                         | Supervisors should see that they have the  |  |                  |            |
|      |                         | requisite resources and expertise to oversee the risks associated with financial |  |                  |            |
|      |                         | innovation and to ensure that firms they   |  |                  |            |
|      |                         | supervise have the capacity to understand  |  |                  |            |
|      |                         | and manage the risks. (FSF 2008)   |  |                  |            |
|      |                         |  |  |                  |            |
| (12) |                         | Supervisory authorities should   |  |                  |            |
|      |                         | continually re-assess their resource needs;                                      |  |                  |            |
|      |                         | for example, interacting with and  |  |                  |            |
|      |                         | assessing Boards require particular skills,                                      |  |                  |            |
|      |                         | experience and adequate level of   |  |                  |            |
|      |                         | seniority. (Rec. 3, FSB 2012)  |  |                  |            |
|      |                         |  |  |                  |            |
|      |                         |  |  |                  |            |
|      |                         |  |  |                  |            |



| No | Description             | G20/FSB Recommendations   | Remarks   | Progress to date   | Next steps   |
|----|-------------------------|---|---|--|--|
| V. | Building and implemen   | nting macroprudential frameworks an   | d tools   |  |  |
| 13 | Establishing regulatory | Amend our regulatory systems to ensure  | Please describe major changes in the  | ☐ Not applicable   | Planned actions (if any): The FSOC   |
|    |                         | Amend our regulatory systems to ensure authorities are able to identify and take account of macro-prudential risks across the financial system including in the case of regulated banks, shadow banks <sup>5</sup> and private pools of capital to limit the build up of systemic risk. (London)  Ensure that national regulators possess the powers for gathering relevant information on all material financial institutions, markets and instruments in order to assess the potential for failure or severe stress to contribute to systemic risk. This will be done in close coordination at international level in order to achieve as much consistency as | Please describe major changes in the institutional arrangements for macroprudential policy that have taken place in the past two years, including changes in: i) mandates and objectives; ii) powers and instruments; iii) transparency and accountability arrangements; iv) composition and independence of the decision-making body; and v) mechanisms for domestic policy coordination and consistency.  Please indicate whether an assessment has been conducted with respect to the powers to collect and share relevant information among different authorities – where this applies – on financial | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable "or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  Status of progress: □ Draft in preparation, expected publication by: | Planned actions (if any): The FSOC continues to work to identify, analyze and coordinate responses to threats to financial stability. In 2011, the FSOC issued its first annual report that identifies emerging threats to financial stability. The Federal Reserve also has begun to incorporate macro-prudential considerations in its regulation and supervision of banking firms.  Expected commencement date:  Web-links to relevant documents: |
|    |                         | possible across jurisdictions. (London)   | institutions, markets and instruments to assess the potential for systemic risk.  Please indicate whether the assessment  | □ Draft published as of: □ Final rule or legislation approved and will come into force on:   |  |
|    |                         |   | has indicated any gaps in the powers to collect information, and whether any follow-up actions have been taken.   | ☑ Reform effective (completed) as of: 11/30/2011 and 4/1/2012  |  |
|    |                         |   |   | Short description of the content of the legislation/regulation/guideline: The  |  |

<sup>&</sup>lt;sup>5</sup> The recommendation as applicable to shadow banks will be retained until the monitoring framework for shadow banking, which is one of the designated priority areas under the CFIM, is established.



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | FSOC, chaired by the Secretary of the       |            |
|    |             |                         |         | Treasury, has broad accountability to       |            |
|    |             |                         |         | identify emerging risks to improve          |            |
|    |             |                         |         | financial stability, to improve regulatory  |            |
|    |             |                         |         | coordination and to identify market         |            |
|    |             |                         |         | participants that require heightened        |            |
|    |             |                         |         | supervision. The Dodd-Frank Act also        |            |
|    |             |                         |         | gives regulators authority to take into     |            |
|    |             |                         |         | account macro-prudential considerations     |            |
|    |             |                         |         | in their regulation of financial firms. The |            |
|    |             |                         |         | FSOC may designate financial firms as       |            |
|    |             |                         |         | nonbank systemically important financial    |            |
|    |             |                         |         | institutions if the FSOC finds that the     |            |
|    |             |                         |         | firm's financial distress or failure would  |            |
|    |             |                         |         | threaten the financial stability of the     |            |
|    |             |                         |         | United States. Designated firms are         |            |
|    |             |                         |         | subject to the enhanced prudential          |            |
|    |             |                         |         | standards described in section 165 of the   |            |
|    |             |                         |         | Dodd-Frank Act. In addition, such firms     |            |
|    |             |                         |         | are subject to prudential supervision by    |            |
|    |             |                         |         | the Federal Reserve. The Office of          |            |
|    |             |                         |         | Financial Research (OFR) was granted        |            |
|    |             |                         |         | broad authority to gather information, in   |            |
|    |             |                         |         | particular on parts of the financial system |            |
|    |             |                         |         | that fall outside the regulatory perimeter. |            |
|    |             |                         |         | Highlight main developments since last      |            |
|    |             |                         |         | year's survey: The FSOC has designated      |            |
|    |             |                         |         | three financial firms as nonbank SIFIs      |            |
|    |             |                         |         | (American International Group, General      |            |
|    |             |                         |         | Electric Capital Corporation and            |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date   | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | Prudential Financial). The FSOC issued   |            |
|    |             |                         |         | financial stability reports in 2013 and  |            |
|    |             |                         |         | 2014.  |            |
|    |             |                         |         | Web-links to relevant documents:<br>http://www.gpo.gov/fdsys/pkg/FR-2011-                    |            |
|    |             |                         |         | 11-01/pdf/2011-27377.pdf<br>http://www.gpo.gov/fdsys/pkg/FR-2012-<br>01-23/pdf/2012-1136.pdf |            |



| No   | Description  | G20/FSB Recommendations  | Remarks  | Progress to date  | Next steps                       |
|------|--|--|--|---|----------------------------------|
| 14   | Enhancing system-wide                                  | Authorities should use quantitative  | Please describe at a high level (including   | ☐ Not applicable  | Planned actions (if any):        |
| (14) | monitoring and the use of macro-prudential instruments | indicators and/or constraints on leverage<br>and margins as macro-prudential tools for<br>supervisory purposes. Authorities should | by making reference to financial stability<br>or other public reports, where available)<br>the types of systems, methodologies and | ☐ Applicable but no action envisaged at the moment  If "Not applicable "or "Applicable but" | Expected commencement date:      |
|      |  | use quantitative indicators of leverage as guides for policy, both at the institution-specific and at the macro-prudential         | processes that have been put in place to identify macroprudential risks, including the analysis of risk transmission channels.     | no action envisaged" has been selected, please provide a brief justification:               | Web-links to relevant documents: |
|      |  | (system-wide) level(Rec. 3.1, FSF 2009)  | Please indicate the use of macroprudential tools in the past two   | ☑ Implementation ongoing or completed :   |                                  |
|      |  | We are developing macro-prudential   | years, including the objective for their use and the process used to select, calibrate,  | Issue is being addressed through:   |                                  |
|      |  | policy frameworks and tools to limit the   | and apply them.  | ☑ Primary / Secondary legislation   |                                  |
|      |  | build-up of risks in the financial sector,   |  | ☑ Regulation / Guidelines   |                                  |
|      |  | building on the ongoing work of the FSB-BIS-IMF on this subject. (Cannes)  | See, for reference, the CGFS document on <i>Operationalising the selection and</i>   | Other actions (such as supervisory actions), please specify:                                |                                  |
|      |  |  | application of macroprudential   | The FSOC and member agencies  |                                  |
|      |  |  | instruments (Dec 2012).  | monitor asset prices as part of their   |                                  |
| (14) |  | Authorities should monitor substantial   | Jurisdictions can also refer to the FSB-   | systemic risk monitoring activities. The  |                                  |
|      |  | changes in asset prices and their  | IMF-BIS progress report to the G20 on  | Federal Reserve considers asset price   |                                  |
|      |  | implications for the macro economy and the financial system. (Washington)  | <u>Macroprudential policy tools and</u><br><u>frameworks (Oct 2011)</u> , and the IMF staff  | fluctuations as one input into monetary policy decision-making.                             |                                  |
|      |  |  | papers on Macroprudential policy, an   | Status of progress :  |                                  |
|      |  |  | organizing framework (Mar 2011) and on<br>Key Aspects of Macroprudential policy  | ☐ Draft in preparation, expected publication by:  |                                  |
|      |  |  | (Jun 2013).  | ☑ Draft published as of:  |                                  |
|      |  |  |  | ☐ Final rule or legislation approved and will come into force on:                           |                                  |
|      |  |  |  | ☐ Reform effective (completed) as of:   |                                  |
|      |  |  |  | Short description of the content of the   |                                  |
|      |  |  |  | legislation/ regulation/guideline: As   |                                  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                          | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | noted in Item 4, in October 2012, the     |            |
|    |             |                         |         | SEC proposed capital and margin           |            |
|    |             |                         |         | requirements for security-based swap      |            |
|    |             |                         |         | dealers ("SBSDs") and major security-     |            |
|    |             |                         |         | based swap participants ("MSBSPs"),       |            |
|    |             |                         |         | segregation requirements for SBSDs, and   |            |
|    |             |                         |         | notification requirements with respect to |            |
|    |             |                         |         | segregation for SBSDs and MSBSPs. In      |            |
|    |             |                         |         | July 2013 the FDIC, Federal Reserve and   |            |
|    |             |                         |         | OCC finalized rules implementing key      |            |
|    |             |                         |         | provisions of Basel III, including the    |            |
|    |             |                         |         | countercyclical capital buffer. On April  |            |
|    |             |                         |         | 28, 2011, the CFTC issued a Notice of     |            |
|    |             |                         |         | Proposed Rulemaking on Margin             |            |
|    |             |                         |         | Requirements for Uncleared Swaps for      |            |
|    |             |                         |         | Swap Dealers and Major Swap               |            |
|    |             |                         |         | Participants ("Margin NOPR") proposing    |            |
|    |             |                         |         | draft implementing regulations for both   |            |
|    |             |                         |         | initial margin and variation margin under |            |
|    |             |                         |         | the Dodd-Frank Wall Street Reform and     |            |
|    |             |                         |         | Consumer Protection Act. BCBS and         |            |
|    |             |                         |         | IOSCO formed the Working Group on         |            |
|    |             |                         |         | Margining Requirements ("WGMR") in        |            |
|    |             |                         |         | October 2011 to develop margin            |            |
|    |             |                         |         | requirements for non-centrally cleared    |            |
|    |             |                         |         | derivatives. These requirements were set  |            |
|    |             |                         |         | forth in a joint BCBS-IOSCO report        |            |
|    |             |                         |         | published in September 2013. CFTC         |            |
|    |             |                         |         | staff is drafting a revised proposed      |            |
|    |             |                         |         | rulemaking on margin requirements for     |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                          | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | uncleared swaps for SDs and MSPs in       |            |
|    |             |                         |         | close coordination with U.S. authorities, |            |
|    |             |                         |         | in light of the BCBS-IOSCO September      |            |
|    |             |                         |         | 2013 framework.                           |            |
|    |             |                         |         | Highlight main developments since last    |            |
|    |             |                         |         | year's survey:                            |            |
|    |             |                         |         | Web-links to relevant documents:          |            |
|    |             |                         |         | http://www.sec.gov/rules/proposed/2012/   |            |
|    |             |                         |         | 34-68071.pdf. CFTC Notice of Proposed     |            |
|    |             |                         |         | Rulemaking on Margin Requirements for     |            |
|    |             |                         |         | Uncleared Swaps for Swap Dealers and      |            |
|    |             |                         |         | Major Swap Participants available at      |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/    |            |
|    |             |                         |         | @lrfederalregister/document July 2013     |            |
|    |             |                         |         | Final Rule                                |            |
|    |             |                         |         | http://www.federalreserve.gov/newsevent   |            |
|    |             |                         |         | s/press/bcreg/20130702a.htm               |            |



| No   | Description                           | G20/FSB Recommendations  | Remarks  | Progress to date  | Next steps                       |
|------|---------------------------------------|--|--|---|----------------------------------|
| 15   | Improved cooperation                  | Supervisors and central banks should   | Please describe the institutional  | ☐ Not applicable  | Planned actions (if any):        |
| (15) | between supervisors and central banks | improve cooperation and the exchange of information including in the assessment of financial stability risks. The exchange | framework through which information sharing between supervisors and the central bank takes place, e.g. through   | ☐ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but | Expected commencement date:      |
|      |                                       | of information should be rapid during periods of market strain. (Rec. V.8, FSF 2008)                                       | internal or inter-agency committee or<br>bilateral MoUs. Please also describe any<br>initiative to remove identified obstacles to<br>enhance cooperation and information | no action envisaged" has been selected, please provide a brief justification:               | Web-links to relevant documents: |
|      |                                       |  | sharing.   | ☑ Implementation ongoing or completed:  |                                  |
|      |                                       |  |  | Issue is being addressed through:   |                                  |
|      |                                       |  |  | ☑ Primary / Secondary legislation   |                                  |
|      |                                       |  |  | ☐ Regulation / Guidelines   |                                  |
|      |                                       |  |  | ☑ Other actions (such as supervisory actions), please specify:                              |                                  |
|      |                                       |  |  | U.S. authorities exchange information   |                                  |
|      |                                       |  |  | amongst themselves and with their   |                                  |
|      |                                       |  |  | foreign counterparts in a number of   |                                  |
|      |                                       |  |  | international groups, including the FSB   |                                  |
|      |                                       |  |  | and its Standing Committee on the   |                                  |
|      |                                       |  |  | Assessment of Vulnerabilities (SCAV).   |                                  |
|      |                                       |  |  | U.S. authorities also have bilateral  |                                  |
|      |                                       |  |  | relationships with foreign supervisors  |                                  |
|      |                                       |  |  | and central banks. U.S. supervisors participate in a number of colleges of                  |                                  |
|      |                                       |  |  | supervisors and CMGs for the largest  |                                  |
|      |                                       |  |  | banking organizations, and U.S.   |                                  |
|      |                                       |  |  | banking agencies participate in the   |                                  |
|      |                                       |  |  | Senior Supervisors Group, where   |                                  |
|      |                                       |  |  | supervisors share information regarding   |                                  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date   | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | the risk management practices of large, global financial firms. Finally, the Dodd-Frank Act created the FSOC to provide comprehensive monitoring of risks to financial stability.  |            |
|    |             |                         |         | Status of progress:  □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: ☑ Reform effective (completed) as of: July 2010  Short description of the content of the legislation/regulation/guideline:  Highlight main developments since last year's survey: In March 2013, the supervisors of G-SIBs began transmitting data on the institutions' counterparty credit exposures to a central hub at the BIS. The NYFRB provides information on six US G-SIBs. Reports from this database are distributed to all contributing supervisors. |            |
|    |             |                         |         | Web-links to relevant documents:   |            |



| No         | Description                             | G20/FSB Recommendations   | Remarks  | Progress to date  | Next steps  |
|------------|---|---|--|---|---|
| VI.        | Improving oversight of                  | f credit rating agencies (CRAs)   |  |   |   |
| 16<br>(16) | Enhancing regulation and supervision of | All CRAs whose ratings are used for regulatory purposes should be subject to a  | Jurisdictions should indicate the policy measures undertaken for enhancing                                       | ☐ Not applicable ☐ Applicable but no action envisaged at                      | If this recommendation has not yet been fully implemented, please provide                                     |
|            | CRAs                                    | regulatory oversight regime that includes registration. The regulatory oversight regime should be established by end 2009 | regulation and supervision of CRAs including registration, oversight and sharing of information between national | the moment  If "Not applicable " or "Applicable but                           | reasons for delayed implementation:   |
|            |   | and should be consistent with the IOSCO<br>Code of Conduct Fundamentals.<br>(London)                                      | authorities. They should also indicate their consistency with the following                                      | no action envisaged" has been selected, please provide a brief justification: | Planned actions (if any): IOSCO C6 members will continue to meet to identify conflicts between CRA regulatory |
| (16)       |   | National authorities will enforce compliance and require changes to a rating agency's practices and procedures            | IOSCO document:  • <u>Code of Conduct Fundamentals for</u>   | ✓ Implementation ongoing or completed:  | regimes and seek appropriate resolutions consistent with the IOSCO principles.                                |
|            |   | for managing conflicts of interest and  | Credit Rating Agencies (May 2008)  | Issue is being addressed through:   | IOSCO C6 is now in the process of   |
|            |   | assuring the transparency and quality of  | Jurisdictions may also refer to the  | ☑ Primary / Secondary legislation   | revising the IOSCO CRA Code. The  |
|            |   | the rating process.   | following IOSCO documents:   | ☑ Regulation / Guidelines   | revised IOSCO CRA Code was published  |
|            |   | CRAs should differentiate ratings for<br>structured products and provide full<br>disclosure of their ratings track record | Principle 22 of <u>Principles and</u> Objectives of Securities Regulation  | ☑ Other actions (such as supervisory actions), please specify:                | for consultation in the first quarter of 2014 and the goal is to finalize the                                 |
|            |   | and the information and assumptions that  | (Jun 2010) which calls for registration  | Status of progress :  | IOSCO CRA Code by the end of 2014.  |
|            |   | underpin the ratings process.  The oversight framework should be  | and oversight programs for CRAs  | ☐ Draft in preparation, expected publication by:                              | Expected commencement date:   |
|            |   | consistent across jurisdictions with  | Statement of Principles Regarding the     Activities of Condition Protection                                     | ☐ Draft published as of:  |   |
|            |   | appropriate sharing of information<br>between national authorities, including   | Activities of Credit Rating Agencies (Sep 2003)  | ☐ Final rule or legislation approved and will come into force on:             | Web-links to relevant documents:  |
| (16)       |   | through IOSCO. (London)  Regulators should work together towards  | • <u>Final Report on Supervisory Colleges</u><br>for Credit Rating Agencies (Jul 2013)                           | ☑ Reform effective (completed) as of: 01.06.2007                              | http://www.iosco.org/library/pubdocs/pdf<br>/IOSCOPD437.pdf   |
| (10)       |   | appropriate, globally compatible  |  | Short description of the content of the                                       |   |
|            |   | solutions (to conflicting compliance  |  | legislation/ regulation/guideline: The  |   |
|            |   | obligations for CRAs) as early as possible in 2010. (FSB 2009)  |  | Credit Rating Agency Reform Act of  |   |
| (New)      |   | ` '   |  | 2006 (Rating Agency Act) established  |   |
| (11011)    |   | We encourage further steps to enhance transparency and competition among  |  | self-executing requirements for nationally                                    |   |
|            |   | credit rating agencies. (St Petersburg)   |  | recognized statistical rating organizations                                   |   |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                           | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | (NRSROs) and provided the SEC with         |            |
|    |             |                         |         | exclusive authority to implement a         |            |
|    |             |                         |         | registration and oversight program for     |            |
|    |             |                         |         | NRSROs. In June 2007, the SEC              |            |
|    |             |                         |         | approved rules implementing a              |            |
|    |             |                         |         | registration and oversight program for     |            |
|    |             |                         |         | NRSROs, which became effective that        |            |
|    |             |                         |         | same month. Since adopting the             |            |
|    |             |                         |         | implementing rules in 2007, the SEC has    |            |
|    |             |                         |         | adopted additional amendments to its       |            |
|    |             |                         |         | NRSRO rules. The statutory and             |            |
|    |             |                         |         | regulatory requirements in the U.S. for    |            |
|    |             |                         |         | NRSROs are consistent with the IOSCO       |            |
|    |             |                         |         | Statement of Principles Regarding the      |            |
|    |             |                         |         | Activities of Credit Rating Agencies and   |            |
|    |             |                         |         | the IOSCO Code of Conduct                  |            |
|    |             |                         |         | Fundamentals for Credit Rating             |            |
|    |             |                         |         | Agencies. The IOSCO C6 Report on           |            |
|    |             |                         |         | Regulatory Implementation of the           |            |
|    |             |                         |         | Statement of Principles Regarding the      |            |
|    |             |                         |         | Activities of Credit Rating Agencies,      |            |
|    |             |                         |         | published in its final form in February    |            |
|    |             |                         |         | 2011, concluded that the objectives of the |            |
|    |             |                         |         | IOSCO Statement of Principles              |            |
|    |             |                         |         | Regarding the Activities of Credit Rating  |            |
|    |             |                         |         | Agencies are embedded into all member      |            |
|    |             |                         |         | jurisdictions' programs. The Dodd-Frank    |            |
|    |             |                         |         | Act contains a number of provisions        |            |
|    |             |                         |         | designed to strengthen the SEC's           |            |
|    |             |                         |         | regulatory oversight of NRSROs,            |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | including self-executing requirements and   |            |
|    |             |                         |         | grants of rulemaking authority to the       |            |
|    |             |                         |         | SEC. On May 18, 2011, the SEC voted to      |            |
|    |             |                         |         | propose new rules and amendments that       |            |
|    |             |                         |         | would implement certain provisions of       |            |
|    |             |                         |         | the Dodd-Frank Act and enhance the          |            |
|    |             |                         |         | SEC's existing rules governing credit       |            |
|    |             |                         |         | ratings and NRSROs. If adopted as           |            |
|    |             |                         |         | proposed, NRSROs would be required to,      |            |
|    |             |                         |         | among other things: • Report on internal    |            |
|    |             |                         |         | controls. • Protect against certain         |            |
|    |             |                         |         | additional conflicts of interest. •         |            |
|    |             |                         |         | Establish professional standards for credit |            |
|    |             |                         |         | analysts. • Publicly provide – along with   |            |
|    |             |                         |         | the publication of the credit rating –      |            |
|    |             |                         |         | disclosure about the credit rating and the  |            |
|    |             |                         |         | methodology used to determine it. •         |            |
|    |             |                         |         | Enhance their public disclosures about      |            |
|    |             |                         |         | the performance of their credit ratings. In |            |
|    |             |                         |         | May 2009, IOSCO created the                 |            |
|    |             |                         |         | Committee on Credit Rating Agencies -       |            |
|    |             |                         |         | Committee 6 (C6), currently chaired by      |            |
|    |             |                         |         | the SEC. The mandate for C6 is to           |            |
|    |             |                         |         | regularly discuss, evaluate and consider    |            |
|    |             |                         |         | regulatory and policy initiatives vis-à-vis |            |
|    |             |                         |         | credit rating agency activities and         |            |
|    |             |                         |         | oversight in an effort to seek cross border |            |
|    |             |                         |         | regulatory consensus through such means     |            |
|    |             |                         |         | as the IOSCO CRA Code and to facilitate     |            |
|    |             |                         |         | regular dialogue between securities         |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                             | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | regulators and the credit ratings industry.  |            |
|    |             |                         |         | Since its establishment, C6 has met          |            |
|    |             |                         |         | approximately three times a year, during     |            |
|    |             |                         |         | which meetings committee members have        |            |
|    |             |                         |         | discussed the regulatory developments in     |            |
|    |             |                         |         | their respective jurisdictions. In addition, |            |
|    |             |                         |         | representatives from CRAs have attended      |            |
|    |             |                         |         | a portion of several of the triannual        |            |
|    |             |                         |         | meetings to advise C6 members of issues      |            |
|    |             |                         |         | arising in the CRA industry that result      |            |
|    |             |                         |         | from regulatory developments.                |            |
|    |             |                         |         | Highlight main developments since last       |            |
|    |             |                         |         | year's survey: Consistent with the           |            |
|    |             |                         |         | IOSCO Final Report on Supervisory            |            |
|    |             |                         |         | Colleges for Credit Rating Agencies, the     |            |
|    |             |                         |         | SEC formed Supervisory Colleges              |            |
|    |             |                         |         | (Colleges) for each of the large, globally   |            |
|    |             |                         |         | active CRAs (Fitch, Moody's, and S&P)        |            |
|    |             |                         |         | and held the first in-person meetings in     |            |
|    |             |                         |         | November 2013. The Colleges serve as a       |            |
|    |             |                         |         | resource for CRA supervisors by              |            |
|    |             |                         |         | facilitating, among other things,            |            |
|    |             |                         |         | information exchange. The Colleges plan      |            |
|    |             |                         |         | to have quarterly calls and an annual, in-   |            |
|    |             |                         |         | person meeting.                              |            |
|    |             |                         |         | Web-links to relevant documents:             |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2007/34-      |            |
|    |             |                         |         | 55857.pdf                                    |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2009/34-      |            |
|    |             |                         |         | 59342.pdf                                    |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                        | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | http://www.sec.gov/rules/final/2009/34- |            |
|    |             |                         |         | 61050.pdf                               |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2010/33- |            |
|    |             |                         |         | 9146.pdf                                |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/33- |            |
|    |             |                         |         | 9175.pdf                                |            |
|    |             |                         |         | http://www.sec.gov/rules/final/2011/33- |            |
|    |             |                         |         | 9245.pdf                                |            |
|    |             |                         |         | http://www.sec.gov/rules/proposed/2011/ |            |
|    |             |                         |         | 34-64514.pdf                            |            |



| No   | Description           | G20/FSB Recommendations  | Remarks                               | Progress to date | Next steps |
|------|-----------------------|--|---------------------------------------|------------------|------------|
| 17   | Reducing the reliance | We also endorsed the FSB's principles on   | No information on this recommendation |                  |            |
| (17) | on ratings            | reducing reliance on external credit   | will be collected in the current IMN  |                  |            |
|      |                       | ratings. Standard setters, market  | survey since the report of the second |                  |            |
|      |                       | participants, supervisors and central  | stage of the thematic peer review has |                  |            |
|      |                       | banks should not rely mechanistically on   | been published recently [insert link  |                  |            |
|      |                       | external credit ratings. (Seoul)   | whenever published].                  |                  |            |
|      |                       | Authorities should check that the roles  |                                       |                  |            |
|      |                       | that they have assigned to ratings in  |                                       |                  |            |
|      |                       | regulations and supervisory rules are  |                                       |                  |            |
|      |                       | consistent with the objectives of having   |                                       |                  |            |
|      |                       | investors make independent judgment of   |                                       |                  |            |
|      |                       | risks and perform their own due  |                                       |                  |            |
|      |                       | diligence, and that they do not induce   |                                       |                  |            |
|      |                       | uncritical reliance on credit ratings as a   |                                       |                  |            |
|      |                       | substitute for that independent evaluation.  |                                       |                  |            |
|      |                       | (Rec IV. 8, FSF 2008)  |                                       |                  |            |
|      |                       | We reaffirm our commitment to reduce   |                                       |                  |            |
|      |                       | authorities' and financial institutions'   |                                       |                  |            |
|      |                       | reliance on external credit ratings, and   |                                       |                  |            |
|      |                       | call on standard setters, market   |                                       |                  |            |
|      |                       | participants, supervisors and central  |                                       |                  |            |
|      |                       | banks to implement the agreed FSB  |                                       |                  |            |
|      |                       | principles and end practices that rely   |                                       |                  |            |
|      |                       | mechanistically on these ratings.  |                                       |                  |            |
|      |                       | (Cannes)   |                                       |                  |            |
|      |                       | We call for a colomate June 1  |                                       |                  |            |
|      |                       | We call for accelerated progress by  |                                       |                  |            |
|      |                       | national authorities and standard setting  |                                       |                  |            |
|      |                       | bodies in ending the mechanistic reliance on credit ratings and encourage steps that |                                       |                  |            |
|      |                       | on credit ratings and encourage steps that   |                                       |                  |            |



| No    | Description | G20/FSB Recommendations                   | Remarks | Progress to date | Next steps |
|-------|-------------|---|---------|------------------|------------|
|       |             | would enhance transparency of and         |         |                  |            |
|       |             | competition among credit rating agencies. |         |                  |            |
|       |             | (Los Cabos)                               |         |                  |            |
| (New) |             |   |         |                  |            |
|       |             | We call on national authorities and       |         |                  |            |
|       |             | standard setting bodies to accelerate     |         |                  |            |
|       |             | progress in reducing reliance on credit   |         |                  |            |
|       |             | rating agencies, in accordance with the   |         |                  |            |
|       |             | FSB roadmap. (St Petersburg)              |         |                  |            |



|   |  | Remarks   | Progress to date  | Next steps  |
|---|--|---|---|---|
| Enhancing and aligning                                      | g accounting standards   |   |   |   |
| Consistent application                                      | Regulators, supervisors, and accounting  | Jurisdictions should indicate the   | ☐ Not applicable  | Planned actions (if any):   |
| Consistent application of high-quality accounting standards | Regulators, supervisors, and accounting standard setters, as appropriate, should work with each other and the private sector on an ongoing basis to ensure consistent application and enforcement of high-quality accounting standards. (Washington) | Jurisdictions should indicate the accounting standards that they follow and whether (and on what basis) they are deemed to be equivalent to IFRSs as published by the IASB or are otherwise of a high and internationally acceptable quality, and provide accurate and relevant information on financial performance. They should also explain the system they have for enforcement of consistent application of those standards.  Jurisdictions may want to refer to their jurisdictional profile prepared by the IFRS Foundation, which can be accessed at: <a href="http://www.ifrs.org/Use-around-the-world/Pages/Jurisdiction-profiles.aspx">http://www.ifrs.org/Use-around-the-world/Pages/Jurisdiction-profiles.aspx</a> . | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable "or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  U.S. banking regulators regularly monitor significant changes to accounting standards that may significantly affect financial institutions and routinely provide comments on such proposals. The banking regulators also routinely meet with standard setters, representatives from audit firms and financial institutions, and the SEC to discuss financial accounting and implementation matters. In addition, the U.S. banking agencies are also members of the Basel Committee's  | Planned actions (if any):  Expected commencement date:  Web-links to relevant documents:  |
|   | of high-quality  | of high-quality accounting standards  standard setters, as appropriate, should work with each other and the private sector on an ongoing basis to ensure consistent application and enforcement of high-quality accounting standards.   | standards setters, as appropriate, should work with each other and the private sector on an ongoing basis to ensure consistent application and enforcement of high-quality accounting standards.  (Washington)  standard setters, as appropriate, should work with each other and the private sector on an ongoing basis to ensure consistent application and enforcement of high-quality accounting standards.  (Washington)  accounting standards that they follow and whether (and on what basis) they are deemed to be equivalent to IFRSs as published by the IASB or are otherwise of a high and internationally acceptable quality, and provide accurate and relevant information on financial performance.  They should also explain the system they have for enforcement of consistent application of those standards.  Jurisdictions may want to refer to their jurisdictional profile prepared by the IFRS Foundation, which can be accessed at: <a href="http://www.ifrs.org/Use-around-the-">http://www.ifrs.org/Use-around-the-</a> | of high-quality accounting standards  standard setters, as appropriate, should work with each other and the private sector on an ongoing basis to ensure consistent application and enforcement of high-quality accounting standards.  (Washington)  accounting standards that they follow and whether (and on what basis) they are deemed to be equivalent to IFRSs as published by the IASB or are otherwise of a high and internationally acceptable quality, and provide accurate and relevant information on financial performance. They should also explain the system they have for enforcement of consistent application of those standards.  Jurisdictions may want to refer to their jurisdictional profile prepared by the IFRS Foundation, which can be accessed at: http://www.ifrs.org/Use-around-the-world/Pages/Jurisdiction-profiles.aspx.  They should also explain the system they have for enforcement of consistent application of those standards.  Jurisdictions may want to refer to their jurisdiction-profile prepared by the IFRS Foundation, which can be accessed at: http://www.ifrs.org/Use-around-the-world/Pages/Jurisdiction-profiles.aspx.  Us. banking regulators regularly monitor significant changes to accounting standards that may significantly affect financial institutions and routinely provide comments on such proposals. The banking regulators also routinely meet with standard setters, representatives from audit firms and financial institutions, and the SEC to discuss financial accounting and implementation matters. In addition, the U.S. banking agencies are also |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date  | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | accounting and auditing issues are                                |            |
|    |             |                         |         | addressed. U.S. banking regulators                                |            |
|    |             |                         |         | regularly issue regulatory reporting                              |            |
|    |             |                         |         | guidance that is consistent with U.S.                             |            |
|    |             |                         |         | GAAP and issue policy guidance as                                 |            |
|    |             |                         |         | necessary. IOSCO maintains a database                             |            |
|    |             |                         |         | and discussion arrangements for                                   |            |
|    |             |                         |         | sharing securities regulators'                                    |            |
|    |             |                         |         | experiences on International Financial                            |            |
|    |             |                         |         | Reporting Standards (IFRS) application                            |            |
|    |             |                         |         | around the world. IOSCO anticipates                               |            |
|    |             |                         |         | meeting periodically with the IASB                                |            |
|    |             |                         |         | staff to discuss these matters and                                |            |
|    |             |                         |         | coordinating database conference calls                            |            |
|    |             |                         |         | several times per year to discuss                                 |            |
|    |             |                         |         | members' emerging IFRS issues. SEC                                |            |
|    |             |                         |         | staff selectively reviews corporate                               |            |
|    |             |                         |         | filings to monitor and enhance                                    |            |
|    |             |                         |         | compliance with applicable disclosure                             |            |
|    |             |                         |         | and accounting requirements and brings                            |            |
|    |             |                         |         | enforcement actions when appropriate.                             |            |
|    |             |                         |         | Status of progress :  |            |
|    |             |                         |         | ☐ Draft in preparation, expected publication by:                  |            |
|    |             |                         |         | ☐ Draft published as of:  |            |
|    |             |                         |         | ☐ Final rule or legislation approved and will come into force on: |            |
|    |             |                         |         | ☑ Reform effective (completed) as of:                             |            |
|    |             |                         |         | Short description of the content of the                           |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date   | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | legislation/ regulation/guideline:   |            |
|    |             |                         |         | Highlight main developments since last year's survey: Web-links to relevant documents: |            |



| No         | Description                                      | G20/FSB Recommendations  | Remarks  | Progress to date  | Next steps  |
|------------|--|--|--|---|---|
| No 19 (19) | Appropriate application of Fair Value Accounting | Accounting standard setters and prudential supervisors should examine the use of valuation reserves or adjustments for fair valued financial instruments when data or modelling needed to support their valuation is weak. (Rec. 3.4, FSF 2009)  Accounting standard setters and prudential supervisors should examine possible changes to relevant standards to dampen adverse dynamics potentially associated with fair value accounting. Possible ways to reduce this potential impact include the following: (1) Enhancing the accounting model so that the use of fair value accounting is carefully examined for financial instruments of credit intermediaries; (ii) Transfers between financial asset categories; (iii) Simplifying hedge accounting requirements. (Rec 3.5, FSF 2009) | Remarks  Jurisdictions should indicate the policy measures taken for appropriate application of fair value accounting.  See, for reference, the following BCBS documents:  • Basel 2.5 standards on prudent valuation (Jul 2009)  • Supervisory guidance for assessing banks' financial instrument fair value practices (Apr 2009) | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  The objective of the joint IASB/FASB project on fair value measurement was to develop common fair value measurement guidance. To achieve this objective, the FASB and the IASB had agreed to the following: 1. The project's objective was to ensure that fair value has the same meaning in U.S. generally accepted accounting principles (GAAP) and International Financial Reporting Standards (IFRS).2. The project's goal was to | If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:  Planned actions (if any): Financial instruments: Classification and measurement – The FASB redeliberations on classification and measurement continue, and a final standard, mostly minor adjustments to current GAAP, is expected in the second half of 2014. The IASB completed its redeliberations and plans to issue its model, based on its proposed solely payments of principle and interest (SPPI) and business model tests, as a final standard in the first half of 2014. Financial instruments: Credit losses (impairment) - the FASB completed its comment letter period and continues to re-deliberate its current expected credit loss (CECL) model for credit losses, a final standard is expected in the second half of 2014. The IASB completed its re-deliberations and plans to issue its three-bucket model as a final standard in the first half of 2014. Financial instruments: Hedge accounting |
|            |  |  |  | make U.S. GAAP and IFRS guidance on fair value measurement the same, other than minor necessary differences   | Financial instruments: Hedge accounting  – It is unclear when the FASB will begin research / re-deliberations on hedge accounting. The IASB will continue to re-  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date  | Next steps                          |
|----|-------------|-------------------------|---------|---|-------------------------------------|
|    |             |                         |         | in wording or style. The FASB agreed                              | deliberate feedback received on its |
|    |             |                         |         | to consider comments received on the                              | discussion paper on macro-hedging.  |
|    |             |                         |         | IASB Exposure Draft, Fair Value                                   |                                     |
|    |             |                         |         | Measurement, and to propose                                       | Expected commencement date:         |
|    |             |                         |         | amendments to guidance on fair value                              | Expected commencement date:         |
|    |             |                         |         | measurement in U.S. GAAP to achieve                               |                                     |
|    |             |                         |         | that goal.  | Web-links to relevant documents:    |
|    |             |                         |         | Status of progress :  |                                     |
|    |             |                         |         | ☐ Draft in preparation, expected publication by:                  |                                     |
|    |             |                         |         | ☐ Draft published as of:  |                                     |
|    |             |                         |         | ☐ Final rule or legislation approved and will come into force on: |                                     |
|    |             |                         |         | ☑ Reform effective (completed) as of: 12.05.2011                  |                                     |
|    |             |                         |         | Short description of the content of the                           |                                     |
|    |             |                         |         | legislation/ regulation/guideline: On                             |                                     |
|    |             |                         |         | May 12, 2011, the FASB completed this                             |                                     |
|    |             |                         |         | project with the issuance of Accounting                           |                                     |
|    |             |                         |         | Standards Update No. 2011-04, Fair                                |                                     |
|    |             |                         |         | Value Measurement (Topic 820):                                    |                                     |
|    |             |                         |         | Amendments to Achieve Common Fair                                 |                                     |
|    |             |                         |         | Value Measurement and Disclosure                                  |                                     |
|    |             |                         |         | Requirements in U.S. GAAP and IFRSs.                              |                                     |
|    |             |                         |         | On May 12, 2011, the IASB issued IFRS                             |                                     |
|    |             |                         |         | 13, Fair Value Measurement. The fair                              |                                     |
|    |             |                         |         | value standards require that assumptions                          |                                     |
|    |             |                         |         | about risk include the risk inherent in a                         |                                     |
|    |             |                         |         | particular valuation technique used to                            |                                     |
|    |             |                         |         | measure fair value (such as a pricing                             |                                     |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | model) and the risk inherent in the inputs  |            |
|    |             |                         |         | to the valuation technique. Such            |            |
|    |             |                         |         | assumptions about risk may require a risk   |            |
|    |             |                         |         | adjustment when there is significant        |            |
|    |             |                         |         | measurement uncertainty. The FASB           |            |
|    |             |                         |         | and the IASB are addressing accounting      |            |
|    |             |                         |         | for financial instruments, including hedge  |            |
|    |             |                         |         | accounting, through their respective        |            |
|    |             |                         |         | financial instruments accounting projects   |            |
|    |             |                         |         | The FASB and the IASB have both             |            |
|    |             |                         |         | issued exposure drafts of their proposals   |            |
|    |             |                         |         | on financial instrument classification and  |            |
|    |             |                         |         | measurement and the accounting for          |            |
|    |             |                         |         | credit impairment. The Boards believe       |            |
|    |             |                         |         | that these projects will: a. Reconsider the |            |
|    |             |                         |         | recognition and measurement of financial    |            |
|    |             |                         |         | instruments b. Address issues related to    |            |
|    |             |                         |         | impairment of financial instruments The     |            |
|    |             |                         |         | IASB issued a final General Hedge           |            |
|    |             |                         |         | Accounting IFRS in 2013. This project       |            |
|    |             |                         |         | replaced certain rules-based hedge          |            |
|    |             |                         |         | accounting requirements in IAS 39           |            |
|    |             |                         |         | Financial Instruments: Recognition and      |            |
|    |             |                         |         | Measurement with a more principles-         |            |
|    |             |                         |         | based approach designed to more closely     |            |
|    |             |                         |         | align the accounting with risk              |            |
|    |             |                         |         | management activities. The objective of     |            |
|    |             |                         |         | this standard is to improve the ability of  |            |
|    |             |                         |         | investors to understand risk management     |            |
|    |             |                         |         | activities and to assess the amounts,       |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                           | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | timing and uncertainty of future cash      |            |
|    |             |                         |         | flows. In April 2014, the IASB             |            |
|    |             |                         |         | published a discussion paper on macro      |            |
|    |             |                         |         | hedging exploring an approach to better    |            |
|    |             |                         |         | reflect entities' dynamic risk management  |            |
|    |             |                         |         | activities in their financial statements.  |            |
|    |             |                         |         | The FASB included proposed revisions to    |            |
|    |             |                         |         | the accounting for derivative instruments  |            |
|    |             |                         |         | and hedging activities in its May 2010     |            |
|    |             |                         |         | proposal. Although the FASB has not        |            |
|    |             |                         |         | begun redeliberating its May 2010 hedge    |            |
|    |             |                         |         | accounting proposals, the FASB has said    |            |
|    |             |                         |         | that during its research and               |            |
|    |             |                         |         | redeliberations, it will also consider the |            |
|    |             |                         |         | IASB's hedge accounting standard.          |            |
|    |             |                         |         | Highlight main developments since last     |            |
|    |             |                         |         | year's survey: Financial instruments:      |            |
|    |             |                         |         | Classification and measurement – FASB      |            |
|    |             |                         |         | continued its re-deliberations and in late |            |
|    |             |                         |         | 2013, determined to not pursue the         |            |
|    |             |                         |         | proposed joint model with the IASB,        |            |
|    |             |                         |         | based on its proposed solely payments of   |            |
|    |             |                         |         | principle and interest (SPPI) and business |            |
|    |             |                         |         | model tests, and to mostly retain current  |            |
|    |             |                         |         | GAAP with targeted amendments. The         |            |
|    |             |                         |         | IASB completed its re-deliberations and    |            |
|    |             |                         |         | plans to issue its model, based on the     |            |
|    |             |                         |         | joint proposal, as a final standard in the |            |
|    |             |                         |         | first half of 2014. Financial instruments: |            |
|    |             |                         |         | Credit losses (impairment) – Both the      |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                             | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | FASB and IASB continued to separately        |            |
|    |             |                         |         | deliberate feedback received from the        |            |
|    |             |                         |         | commenting process and develop               |            |
|    |             |                         |         | implementation guidance for their            |            |
|    |             |                         |         | pending standards. The FASB continued        |            |
|    |             |                         |         | to refine their current expected credit loss |            |
|    |             |                         |         | model and plans to issue a final standard    |            |
|    |             |                         |         | in the second half of 2014. The IASB         |            |
|    |             |                         |         | finished its re-deliberations and plan on    |            |
|    |             |                         |         | issuing a final standard, based on their 3-  |            |
|    |             |                         |         | bucket model, in the first half of 2014.     |            |
|    |             |                         |         | Financial instruments: Hedge accounting      |            |
|    |             |                         |         | - The FASB has not begun re-                 |            |
|    |             |                         |         | deliberations on hedge accounting since      |            |
|    |             |                         |         | its 2010 proposal. The IASB completed        |            |
|    |             |                         |         | its General Hedge Accounting project and     |            |
|    |             |                         |         | published new requirements in IFRS 9.        |            |
|    |             |                         |         | In addition, in April 2014 the IASB          |            |
|    |             |                         |         | published a discussion paper on macro        |            |
|    |             |                         |         | hedging exploring an approach to better      |            |
|    |             |                         |         | reflect entities' dynamic risk management    |            |
|    |             |                         |         | activities in their financial statements.    |            |
|    |             |                         |         | Web-links to relevant documents:             |            |
|    |             |                         |         | IASB staff summary of IFRS 13:               |            |
|    |             |                         |         | http://www.ifrs.org/Current-                 |            |
|    |             |                         |         | Projects/IASB-Projects/Fair-Value-           |            |
|    |             |                         |         | Measurement/IFRS-13-Fair-Value-              |            |
|    |             |                         |         | Measurement/Documents/FairValueMeas          |            |
|    |             |                         |         | urementFeedbackstatement_May2011.pdf         |            |
|    |             |                         |         | FASB ASU 2011-04:                            |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                        | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | http://www.fasb.org/cs/BlobServer?blobc |            |
|    |             |                         |         | ol=urldata&blobtable=MungoBlobs&blo     |            |
|    |             |                         |         | bkey=id&blobwhere=1175822486936&b       |            |
|    |             |                         |         | lobheader=application%2Fpdf IASB        |            |
|    |             |                         |         | classification and measurement exposure |            |
|    |             |                         |         | draft: http://www.ifrs.org/Current-     |            |
|    |             |                         |         | Projects/IASB-Projects/Financial-       |            |
|    |             |                         |         | Instruments-A-Replacement-of-IAS-39-    |            |
|    |             |                         |         | Financial-Instruments-                  |            |
|    |             |                         |         | Recognitio/Limited-modifications-to-    |            |
|    |             |                         |         | IFRS-9/Documents/ED-Classification-     |            |
|    |             |                         |         | and-Measurement-November-2012-          |            |
|    |             |                         |         | bookmarks.pdf IASB credit losses        |            |
|    |             |                         |         | exposure draft:                         |            |
|    |             |                         |         | http://www.ifrs.org/Current-            |            |
|    |             |                         |         | Projects/IASB-Projects/Financial-       |            |
|    |             |                         |         | Instruments-A-Replacement-of-IAS-39-    |            |
|    |             |                         |         | Financial-Instruments-                  |            |
|    |             |                         |         | Recognitio/Impairment/Exposure-Draft-   |            |
|    |             |                         |         | March-2013/Comment-                     |            |
|    |             |                         |         | letters/Documents/ED-Financial-         |            |
|    |             |                         |         | Instruments-Expected-Credit-Losses-     |            |
|    |             |                         |         | March-2013.pdf FASB classification and  |            |
|    |             |                         |         | measurement exposure draft:             |            |
|    |             |                         |         | http://www.fasb.org/cs/BlobServer?blobk |            |
|    |             |                         |         | ey=id&blobnocache=true&blobwhere=11     |            |
|    |             |                         |         | 75825999175&blobheader=application%     |            |
|    |             |                         |         | 2Fpdf&blobcol=urldata&blobtable=Mun     |            |
|    |             |                         |         | goBlobs FASB credit losses exposure     |            |
|    |             |                         |         | draft:                                  |            |

USA

| No | Description | G20/FSB Recommendations | Remarks | Progress to date                        | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | http://www.fasb.org/cs/BlobServer?blobk |            |
|    |             |                         |         | ey=id&blobnocache=true&blobwhere=11     |            |
|    |             |                         |         | 75825477164&blobheader=application%     |            |
|    |             |                         |         | 2Fpdf&blobcol=urldata&blobtable=Mun     |            |
|    |             |                         |         | goBlobs                                 |            |



| No         | Description  | G20/FSB Recommendations   | Remarks  | Progress to date  | Next steps   |
|------------|--|---|--|---|--|
| VIII.      | Enhancing risk manag   | ement   |  |   |  |
| 20<br>(20) | Enhancing guidance to strengthen banks' risk management practices, including on liquidity and foreign currency funding risks | Regulators should develop enhanced guidance to strengthen banks' risk management practices, in line with international best practices, and should encourage financial firms to re-examine their internal controls and implement strengthened policies for sound risk management. (Washington)  National supervisors should closely check banks' implementation of the updated guidance on the management and supervision of liquidity as part of their regular supervision. If banks' implementation of the guidance is | Jurisdictions should indicate the policy measures taken to enhance guidance to strengthen banks' risk management practices.  In particular, please indicate the status of implementation of the following standards:  • BCBS Basel III: International framework for liquidity risk measurement, standards and monitoring (Dec 2010)  • BCBS Principles for sound stress testing practices and supervision (May 2009) | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify: | Planned actions (if any): The Federal Reserve Board, FDIC, and OCC are implementing the finalized rule on the Liquidity Coverage Ratio.  Expected commencement date:  Web-links to relevant documents: |
| (20)       |  | inadequate, supervisors will take more prescriptive action to improve practices. (Rec. II.10, FSF 2008)  Regulators and supervisors in emerging markets <sup>6</sup> will enhance their supervision of banks' operation in foreign currency funding markets. (FSB 2009)  We commit to conduct robust, transparent stress tests as needed. (Pittsburgh)  | Jurisdictions may also refer to FSB's thematic peer review report on risk governance (Feb 2013) and BCBS Peer review of supervisory authorities' implementation of stress testing principles (Apr 2012)  | Status of progress:  □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: September 3, 2014 □ Reform effective (completed) as of: Short description of the content of the legislation/regulation/guideline: - The Federal Reserve Board, along with the  |  |

 $<sup>^{6}</sup>$  Only the emerging market jurisdictions that are members of the FSB may respond to this recommendation.



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | FDIC and OCC, proposed a rule to            |            |
|    |             |                         |         | strengthen the liquidity positions of large |            |
|    |             |                         |         | financial institutions. The proposal would  |            |
|    |             |                         |         | for the first time create a standardized    |            |
|    |             |                         |         | minimum liquidity requirement for large     |            |
|    |             |                         |         | and internationally active banking          |            |
|    |             |                         |         | organizations and systemically important,   |            |
|    |             |                         |         | non-bank financial companies designated     |            |
|    |             |                         |         | by the Financial Stability Oversight        |            |
|    |             |                         |         | Council. These institutions would be        |            |
|    |             |                         |         | required to hold minimum amounts of         |            |
|    |             |                         |         | high-quality, liquid assets such as central |            |
|    |             |                         |         | bank reserves and government and            |            |
|    |             |                         |         | corporate debt that can be converted        |            |
|    |             |                         |         | easily and quickly into cash. Each          |            |
|    |             |                         |         | institution would be required to hold       |            |
|    |             |                         |         | liquidity in an amount equal to or greater  |            |
|    |             |                         |         | than its projected cash outflows minus its  |            |
|    |             |                         |         | projected cash inflows during a short-      |            |
|    |             |                         |         | term stress period. The ratio of the firm's |            |
|    |             |                         |         | liquid assets to its projected net cash     |            |
|    |             |                         |         | outflow is its "liquidity coverage ratio,"  |            |
|    |             |                         |         | or LCR The Federal Reserve Board            |            |
|    |             |                         |         | published two final rules in October of     |            |
|    |             |                         |         | 2012 with stress testing requirements for   |            |
|    |             |                         |         | certain bank holding companies, state       |            |
|    |             |                         |         | member banks, and savings and loan          |            |
|    |             |                         |         | holding companies. The final rules          |            |
|    |             |                         |         | implement sections 165(i)(1) and (i)(2) of  |            |
|    |             |                         |         | the Dodd-Frank Wall Street Reform and       |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | Consumer Protection Act that require        |            |
|    |             |                         |         | supervisory and company-run stress tests.   |            |
|    |             |                         |         | Nonbank financial companies designated      |            |
|    |             |                         |         | by the Financial Stability Oversight        |            |
|    |             |                         |         | Council will also be subject to certain     |            |
|    |             |                         |         | stress testing requirements contained in    |            |
|    |             |                         |         | the rules. Section 165(i)(2) of the Dodd-   |            |
|    |             |                         |         | Frank Wall Street Reform and Consumer       |            |
|    |             |                         |         | Protection Act ("Dodd-Frank Act")           |            |
|    |             |                         |         | requires national banks and federal         |            |
|    |             |                         |         | savings associations with total             |            |
|    |             |                         |         | consolidated assets of more than \$10       |            |
|    |             |                         |         | billion to conduct annual stress tests. On  |            |
|    |             |                         |         | October 9, 2012, the OCC published its      |            |
|    |             |                         |         | final annual stress test rule (12 CFR 46),  |            |
|    |             |                         |         | which set out definitions and rules for     |            |
|    |             |                         |         | scope of application, scenarios, reporting, |            |
|    |             |                         |         | and disclosure. The OCC provides the        |            |
|    |             |                         |         | required scenarios to the covered           |            |
|    |             |                         |         | institutions by November 15 of each year.   |            |
|    |             |                         |         | The results of the company-run stress       |            |
|    |             |                         |         | tests provide the OCC with forward-         |            |
|    |             |                         |         | looking information that is used in bank    |            |
|    |             |                         |         | supervision and assists the agency in       |            |
|    |             |                         |         | assessing the company's risk profile and    |            |
|    |             |                         |         | capital adequacy The Federal Reserve        |            |
|    |             |                         |         | Board approved a final rule strengthening   |            |
|    |             |                         |         | supervision and regulation of large U.S.    |            |
|    |             |                         |         | bank holding companies and foreign          |            |
|    |             |                         |         | banking organizations. The final rule       |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                          | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | establishes a number of enhanced          |            |
|    |             |                         |         | prudential standards for large U.S. bank  |            |
|    |             |                         |         | holding companies and foreign banking     |            |
|    |             |                         |         | organizations to help increase the        |            |
|    |             |                         |         | resiliency of their operations. These     |            |
|    |             |                         |         | standards include liquidity, risk         |            |
|    |             |                         |         | management, and capital. It also requires |            |
|    |             |                         |         | a foreign banking organization with a     |            |
|    |             |                         |         | significant U.S. presence to establish an |            |
|    |             |                         |         | intermediate holding company over its     |            |
|    |             |                         |         | U.S. subsidiaries, which will facilitate  |            |
|    |             |                         |         | consistent supervision and regulation of  |            |
|    |             |                         |         | the U.S. operations of the foreign bank.  |            |
|    |             |                         |         | The final rule was required by section    |            |
|    |             |                         |         | 165 of the Dodd-Frank Wall Street         |            |
|    |             |                         |         | Reform and Consumer Protection Act.       |            |
|    |             |                         |         | Highlight main developments since last    |            |
|    |             |                         |         | year's survey: Finalizing the Enhanced    |            |
|    |             |                         |         | Prudential Standards discussed above and  |            |
|    |             |                         |         | issued the U.S. LCR.                      |            |
|    |             |                         |         | Web-links to relevant documents:          |            |
|    |             |                         |         | http://www.federalreserve.gov/boarddocs   |            |
|    |             |                         |         | /srletters/2010/sr1006.htm                |            |
|    |             |                         |         | http://www.federalreserve.gov/newsevent   |            |
|    |             |                         |         | s/press/bcreg/20131024a.htm               |            |
|    |             |                         |         | http://www.federalreserve.gov/newsevent   |            |
|    |             |                         |         | s/press/bcreg/20121009a.htm               |            |
|    |             |                         |         | http://www.federalreserve.gov/newsevent   |            |
|    |             |                         |         | s/press/bcreg/20140218a.htm               |            |



| No         | Description   | G20/FSB Recommendations  | Remarks   | Progress to date  | Next steps  |
|------------|---|--|---|---|---|
| 21<br>(21) | Efforts to deal with impaired assets and raise additional capital | Our efforts to deal with impaired assets and to encourage the raising of additional capital must continue, where needed. | Jurisdictions should indicate steps taken<br>to reduce impaired assets and encourage<br>additional capital raising. For example,  | ☐ Not applicable ☐ Applicable but no action envisaged at the moment   | Planned actions (if any): In all cases under the normal supervisory process supervisors will actively encourage the   |
|            | raise additional capital  | capital must continue, where needed. (Pittsburgh)  | additional capital raising. For example, jurisdictions could include here the amount of new equity raised by banks operating in their jurisdictions during 2013. Jurisdictions may also refer to the relevant IMF Financial Soundness Indicators at <a href="http://fsi.imf.org/">http://fsi.imf.org/</a> . | If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification:  ☑ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines ☑ Other actions (such as supervisory actions), please specify: The FASB and the IASB have been continuing to consider possible amendments to their standards on financial instrument impairment. See No. 19 above. Since the Pittsburgh Summit in September 2009, the U.S. regulators published additional guidance for the 19 SCAP firms about the type of analysis the largest firms would be required to undertake prior to undertaking any capital action that would result in a reduction in their common equity.  Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved | supervisors will actively encourage the firms to raise additional capital in situations where there are expected shortfalls in a firm's overall capital adequacy. Specifically, the largest U.S. banking organizations going forward are expected to submit a comprehensive capital plan that considers the potential migration of problem assets and the impact of this migration on the banking organization's capital base and their future capital needs. The capital plan should take into consideration a business as usual scenario as well as a more severe economic scenario where management's outlook for losses, earnings, liquidity and funding has been substantially impaired. The largest firms would be expected to demonstrate that over the projected capital plan period, and under the firm's current and prospective financial condition, they would continue to hold capital sufficiently above the regulatory minimums for a well-capitalized institution in light of the institution's overall risk profile. |
|            |   |  |   | and will come into force on:  | Expected commencement date:   |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                        | Next steps                       |
|----|-------------|-------------------------|---------|---|----------------------------------|
|    |             |                         |         | ☑ Reform effective (completed) as of:   |                                  |
|    |             |                         |         | Short description of the content of the | Web-links to relevant documents: |
|    |             |                         |         | legislation/ regulation/guideline:      |                                  |
|    |             |                         |         | Highlight main developments since last  |                                  |
|    |             |                         |         | year's survey:                          |                                  |
|    |             |                         |         | Web-links to relevant documents:        |                                  |



| No    | Description                           | G20/FSB Recommendations  | Remarks  | Progress to date   | Next steps                       |
|-------|---------------------------------------|--|--|--|----------------------------------|
| 22    | Enhanced risk                         | Financial institutions should provide  | Jurisdictions should indicate the status of  | ☐ Not applicable   | Planned actions (if any):        |
| (22)  | disclosures by financial institutions | enhanced risk disclosures in their reporting and disclose all losses on an ongoing basis, consistent with international best practice, as appropriate. | implementation of the disclosures<br>requirements of IFRSs (in particular<br>IFRS7 and 13) or equivalent.<br>Jurisdictions may also use as reference | ☐ Applicable but no action envisaged at the moment  If "Not applicable "or "Applicable but no action envisaged" has been | Expected commencement date:      |
|       |                                       | (Washington)   | the recommendations of the October 2012 report by the Enhanced Disclosure Task Force on <i>Enhancing the Risk Disclosures</i>                        | selected, please provide a brief justification:  | Web-links to relevant documents: |
|       |                                       |  | of Banks and Implementation Progress   | ☑ Implementation ongoing or completed :  |                                  |
|       |                                       |  | Report by the EDTF (Aug 2013).   | Issue is being addressed through:  |                                  |
| (New) |                                       | W C 41 CC 4 1 4  |  | ☐ Primary / Secondary legislation  |                                  |
| (New) |                                       | We encourage further efforts by the public and private sector to enhance   |  | ☐ Regulation / Guidelines  |                                  |
|       |                                       | financial institutions' disclosures of the risks they face, including the ongoing  |  | ☐ Other actions (such as supervisory actions), please specify:   |                                  |
|       |                                       | work of the Enhanced Disclosure Task   |  | Status of progress :   |                                  |
|       |                                       | Force. (St. Petersburg)  |  | ☐ Draft in preparation, expected publication by:   |                                  |
|       |                                       |  |  | ☐ Draft published as of:   |                                  |
|       |                                       |  |  | ☐ Final rule or legislation approved and will come into force on:  |                                  |
|       |                                       |  |  | ☑ Reform effective (completed) as of: 01.01.2010   |                                  |
|       |                                       |  |  | Short description of the content of the  |                                  |
|       |                                       |  |  | legislation/ regulation/guideline: The   |                                  |
|       |                                       |  |  | FASB issued a final accounting standard  |                                  |
|       |                                       |  |  | in January 2010, "Improving Disclosures  |                                  |
|       |                                       |  |  | about Fair Value," to improve the  |                                  |
|       |                                       |  |  | disclosures about fair value measurement.  |                                  |
|       |                                       |  |  | The disclosure requirements became fully effective for reporting periods beginning                                       |                                  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                             | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | after December 15, 2010. The FASB            |            |
|    |             |                         |         | issued a final accounting standard in July   |            |
|    |             |                         |         | 2010, "Disclosures about the Credit          |            |
|    |             |                         |         | Quality of Financing Receivables and the     |            |
|    |             |                         |         | Allowance for Credit Losses, to provide      |            |
|    |             |                         |         | greater transparency about entities credit   |            |
|    |             |                         |         | risk exposures and the allowance for         |            |
|    |             |                         |         | credit losses. The disclosures provide       |            |
|    |             |                         |         | additional information about the nature of   |            |
|    |             |                         |         | credit risks inherent in entities' financing |            |
|    |             |                         |         | receivables, how credit risk is analyzed     |            |
|    |             |                         |         | and assessed when determining the            |            |
|    |             |                         |         | allowance for credit losses, and the         |            |
|    |             |                         |         | reasons for the change in the allowance      |            |
|    |             |                         |         | for credit losses. The FASB issued a final   |            |
|    |             |                         |         | accounting standard in February 2013         |            |
|    |             |                         |         | "Financial Instruments (Topic 825):          |            |
|    |             |                         |         | Clarifying the Scope and Applicability of    |            |
|    |             |                         |         | a Particular Disclosure to Nonpublic         |            |
|    |             |                         |         | Entities." The amendments clarify that       |            |
|    |             |                         |         | the requirement to disclose "the level of    |            |
|    |             |                         |         | the fair value hierarchy within which the    |            |
|    |             |                         |         | fair value measurements are categorized      |            |
|    |             |                         |         | in their entirety (Level 1, 2, or 3)" does   |            |
|    |             |                         |         | not apply to nonpublic entities for items    |            |
|    |             |                         |         | that are not measured at fair value in the   |            |
|    |             |                         |         | statement of financial position but for      |            |
|    |             |                         |         | which fair value is disclosed. Further, for  |            |
|    |             |                         |         | a broker-dealer that computes deductions     |            |
|    |             |                         |         | to net capital pursuant to Appendix E to     |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | Exchange Act Rule 15c3-1, the SEC has       |            |
|    |             |                         |         | authority to request information that it    |            |
|    |             |                         |         | deems necessary to understand the           |            |
|    |             |                         |         | financial and operational condition of the  |            |
|    |             |                         |         | broker-dealer. Since the financial crisis,  |            |
|    |             |                         |         | SEC staff has requested additional          |            |
|    |             |                         |         | metrics covering specific risk exposures    |            |
|    |             |                         |         | on both an ad hoc and recurring basis.      |            |
|    |             |                         |         | With regard to insurance regulation in the  |            |
|    |             |                         |         | U.S., state insurance regulators use        |            |
|    |             |                         |         | statutory accounting, which includes        |            |
|    |             |                         |         | disclosure of the GAAP fair value           |            |
|    |             |                         |         | hierarchy level for instruments carried at  |            |
|    |             |                         |         | fair value, and the standardized reporting  |            |
|    |             |                         |         | that insurers are required to submit for    |            |
|    |             |                         |         | various purposes, including monitoring      |            |
|    |             |                         |         | the overall risk and financial condition of |            |
|    |             |                         |         | the industry as a whole. This includes      |            |
|    |             |                         |         | security by security listings and           |            |
|    |             |                         |         | identification of restrictions such as      |            |
|    |             |                         |         | pledges and repurchase agreements,          |            |
|    |             |                         |         | concentration disclosures in the            |            |
|    |             |                         |         | Supplemental Risk Interrogatories, and      |            |
|    |             |                         |         | detailed risk descriptions for the various  |            |
|    |             |                         |         | investment classes in the notes to          |            |
|    |             |                         |         | financial statements.                       |            |
|    |             |                         |         | Highlight main developments since last      |            |
|    |             |                         |         | year's survey: The disclosure               |            |
|    |             |                         |         | requirements under Pillar 3 of the Basel II |            |
|    |             |                         |         | framework are now included in the Basel     |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                             | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | III final rule and some of those             |            |
|    |             |                         |         | disclosures now apply to banks using the     |            |
|    |             |                         |         | Standardized Approach. The NAIC has          |            |
|    |             |                         |         | modified the NAIC Holding Company            |            |
|    |             |                         |         | Act to require a new filing, the Form F-     |            |
|    |             |                         |         | Enterprise Risk Report. This requires the    |            |
|    |             |                         |         | ultimate controlling entity to file a report |            |
|    |             |                         |         | that describes any contagion risk to which   |            |
|    |             |                         |         | the group is exposed, and to which the       |            |
|    |             |                         |         | insurance company is subjected. This is      |            |
|    |             |                         |         | achieved by requiring the ultimate           |            |
|    |             |                         |         | controlling party to disclose "any           |            |
|    |             |                         |         | material activity or development of the      |            |
|    |             |                         |         | insurance holding company system that,       |            |
|    |             |                         |         | in the opinion of senior management,         |            |
|    |             |                         |         | could adversely affect the insurance         |            |
|    |             |                         |         | holding company system." The NAIC            |            |
|    |             |                         |         | has also adopted an Own Risk and             |            |
|    |             |                         |         | Solvency Assessment (ORSA) which             |            |
|    |             |                         |         | requires, among other things, the annual     |            |
|    |             |                         |         | filing of a group ORSA Summary Report        |            |
|    |             |                         |         | that US regulators will use to help assess   |            |
|    |             |                         |         | the risk management of insurance groups      |            |
|    |             |                         |         | doing business in the U.S. To date, 20       |            |
|    |             |                         |         | states have now adopted this act, and will   |            |
|    |             |                         |         | require the ORSA Summary Report in           |            |
|    |             |                         |         | 2015.  |            |
|    |             |                         |         | Web-links to relevant documents:             |            |
|    |             |                         |         | http://www.ecfr.gov/cgi-bin/text-            |            |
|    |             |                         |         | idx?c=ecfr&SID=81eedd5ca275d84f5eaf          |            |
|    |             |                         |         | 694af12003be&rgn=div8&view=text&no           |            |
|    |             |                         |         | de=17:3.0.1.1.1.2.95.328&idno=17             |            |



| No   | Description                             | G20/FSB Recommendations   | Remarks   | Progress to date  | Next steps                       |
|------|---|---|---|---|----------------------------------|
| IX.  | Strengthening deposit                   | insurance   |   |   |                                  |
| 23   | Strengthening of                        | National deposit insurance arrangements   | Jurisdictions should describe any   | ☐ Not applicable  | Planned actions (if any):        |
| (23) | national deposit insurance arrangements | should be reviewed against the agreed international principles, and authorities | revisions made to national deposit insurance system, including steps taken to   | ☐ Applicable but no action envisaged at the moment  | Expected commencement date:      |
|      |   | should strengthen arrangements where needed. (Rec. VI.9, FSF 2008)              | address the following recommendations of the FSB's February 2012 <i>thematic</i> peer review report on deposit insurance  systems:  Adoption of an explicit deposit insurance system (for those who do                      | If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification:  ☑ Implementation ongoing or completed:   | Web-links to relevant documents: |
|      |   |   | not have one)   | Issue is being addressed through:   |                                  |
|      |   |   | • Full implementation of the <u>Core</u> <u>Principles for Effective Deposit</u> <u>Insurance Systems</u> jointly issued by  BCBS and IADI in June 2009 (by  addressing the weaknesses and gaps  identified in peer review) | □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Reform effective (completed) as of: 15/10/2013  Short description of the content of the legislation/ regulation/guideline: Clarifies that deposits in branches of U.S. banks located outside the United States are not FDIC-insured deposits. |                                  |
|      |   |   |   | Highlight main developments since last year's survey: The proposed rule   |                                  |

USA

| No | Description | G20/FSB Recommendations | Remarks | Progress to date   | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | identified in last year's survey has been                                    |            |
|    |             |                         |         | finalized.   |            |
|    |             |                         |         | Web-links to relevant documents:<br>https://federalregister.gov/a/2013-22340 |            |



| No   | Description              | G20/FSB Recommendations   | Remarks  | Progress to date  | Next steps  |
|------|--------------------------|---|--|---|---|
| X.   | Safeguarding the integ   | rity and efficiency of financial markets  | 3  |   |   |
| 24   | Enhancing market         | We must ensure that markets serve   | Jurisdictions should indicate whether  | ☐ Not applicable  | Planned actions (if any): The SEC   |
| (24) | integrity and efficiency | efficient allocation of investments and savings in our economies and do not pose  | high frequency trading and dark pools exist in their national markets.   | ☐ Applicable but no action envisaged at the moment  | continues to evaluate proposed  Regulation Systems Compliance and   |
|      |                          | savings in our economies and do not pose risks to financial stability. To this end, we commit to implement initial recommendations by IOSCO on market integrity and efficiency, including measures to address the risks posed by high frequency trading and dark liquidity, and call for further work by mid-2012. (Cannes) | exist in their national markets. Jurisdictions should indicate the progress made in implementing the recommendation in the following IOSCO reports in their regulatory framework:  • Report on Regulatory Issues Raised by the Impact of Technological Changes on Market Integrity and Efficiency (Oct 2011); and  • Report on Principles for Dark Liquidity (May 2011). | the moment  If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification:  ☑ Implementation ongoing or completed:  Issue is being addressed through:  ☑ Primary / Secondary legislation  ☑ Regulation / Guidelines  ☑ Other actions (such as supervisory actions), please specify:  In January 2010, SEC issued a concept release to conduct a broad review of the US equity market structure. The review, which is ongoing, includes an evaluation of equity market structure performance and an assessment of whether market structure rules have kept pace with, among other things, | Integrity ("Reg. SCI"), which would apply to certain self-regulatory organizations (including registered clearing agencies), alternative trading systems ("ATSs"), plan processors, and exempt clearing agencies subject to the Commission's Automation Review Policy (collectively, "SCI entities"), and would require these SCI entities to, among other things, comply with requirements with respect to their automated systems that support the performance of their regulated activities. In general, proposed Reg. SCI would require SCI entities to establish written policies and procedures reasonably designed to ensure that their systems have levels of capacity, integrity, resiliency, availability, and security adequate to maintain their operational capability and |
|      |                          |   |  | changes in trading technology and practices. Market Information Data  | promote the maintenance of fair and orderly markets, and that they operate in   |
|      |                          |   |  | Analytics System or MIDAS. The SEC  | the manner intended. On June 11, 2010,  |
|      |                          |   |  | has implemented a system that will  | the CFTC issued a Notice of Proposed  |
|      |                          |   |  | allow staff to gather information about   | Rulemaking on Co-location/Proximity   |
|      |                          |   |  | all orders posted on the national   | Hosting Services which proposes   |
|      |                          |   |  | exchanges, all modification and   | requirements on DCMs, derivatives   |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date  | Next steps                           |
|----|-------------|-------------------------|---------|---|--------------------------------------|
|    |             |                         |         | cancellation of those orders, all trade                           | transaction execution facilities and |
|    |             |                         |         | execution of those orders, and all off-                           | exempt commercial markets that list. |
|    |             |                         |         | exchange executions to assist it in                               |                                      |
|    |             |                         |         | analysing and overseeing the US                                   | Expected commencement date:          |
|    |             |                         |         | markets.  | Expected commencement date.          |
|    |             |                         |         | Status of progress :  | Web-links to relevant documents:     |
|    |             |                         |         | ☐ Draft in preparation, expected publication by:                  | web-miks to relevant documents:      |
|    |             |                         |         | ☑ Draft published as of:  |                                      |
|    |             |                         |         | ☐ Final rule or legislation approved and will come into force on: |                                      |
|    |             |                         |         | ☑ Reform effective (completed) as of:<br>Oct 2011                 |                                      |
|    |             |                         |         | Short description of the content of the                           |                                      |
|    |             |                         |         | legislation/ regulation/guideline:                                |                                      |
|    |             |                         |         | Recommendations from the Final Report                             |                                      |
|    |             |                         |         | on Regulatory Issues raised by the Impact                         |                                      |
|    |             |                         |         | of Technological Changes on Market                                |                                      |
|    |             |                         |         | Integrity and Efficiency  |                                      |
|    |             |                         |         | (Recommendations) 1-5 and Principles                              |                                      |
|    |             |                         |         | from the Final Report on Principles for                           |                                      |
|    |             |                         |         | Dark Liquidity (Dark Liquidity                                    |                                      |
|    |             |                         |         | Principles) 1-6 are already covered by                            |                                      |
|    |             |                         |         | various provisions of the Securities                              |                                      |
|    |             |                         |         | Exchange Act of 1934, the rules and                               |                                      |
|    |             |                         |         | regulations thereunder and various self-                          |                                      |
|    |             |                         |         | regulatory organization rules. However,                           |                                      |
|    |             |                         |         | the SEC continually evaluates all aspects                         |                                      |
|    |             |                         |         | of market structure, including the issues                         |                                      |
|    |             |                         |         | described in the Recommendations and                              |                                      |
|    |             |                         |         | Dark Liquidity Principles. For example,                           |                                      |





| No | Description | G20/FSB Recommendations | Remarks | Progress to date                           | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | in January 2010, SEC issued a concept      |            |
|    |             |                         |         | release to conduct a broad review of the   |            |
|    |             |                         |         | US equity market structure. The review,    |            |
|    |             |                         |         | which is ongoing, includes an evaluation   |            |
|    |             |                         |         | of equity market structure performance     |            |
|    |             |                         |         | and an assessment of whether market        |            |
|    |             |                         |         | structure rules have kept pace with,       |            |
|    |             |                         |         | among other things, changes in trading     |            |
|    |             |                         |         | technology and practices. In 2013, the     |            |
|    |             |                         |         | SEC implemented a new website devoted      |            |
|    |             |                         |         | to market structure data and analysis      |            |
|    |             |                         |         | drawn from a range of sources. The SEC     |            |
|    |             |                         |         | assesses this data in considering critical |            |
|    |             |                         |         | issues raised by the current market        |            |
|    |             |                         |         | structure concerns. The SEC continues      |            |
|    |             |                         |         | to study and consider regulatory           |            |
|    |             |                         |         | initiatives concerning Alternative Trading |            |
|    |             |                         |         | Systems ("ATS"). Most recently, SEC        |            |
|    |             |                         |         | staff published a white paper that         |            |
|    |             |                         |         | describes ATS trading activity on the      |            |
|    |             |                         |         | market structure website. SEC staff also   |            |
|    |             |                         |         | published a review of current economic     |            |
|    |             |                         |         | literature on fragmentation in the equity  |            |
|    |             |                         |         | markets. This literature review            |            |
|    |             |                         |         | addressed several topics, including dark,  |            |
|    |             |                         |         | or undisplayed, liquidity. The purpose of  |            |
|    |             |                         |         | these efforts is to generate a sound       |            |
|    |             |                         |         | empirical basis for conclusions on         |            |
|    |             |                         |         | whether problems exist that require        |            |
|    |             |                         |         | regulatory action and, if so, what         |            |
|    |             |                         |         | potential solutions to the problems should |            |
|    |             |                         |         | look like. Additional data concerning      |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                            | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | ATS trading activity recently became        |            |
|    |             |                         |         | available as a result of a FINRA rule that  |            |
|    |             |                         |         | the SEC approved. The rule requires         |            |
|    |             |                         |         | registered ATSs to report to FINRA          |            |
|    |             |                         |         | aggregate weekly trading volume and         |            |
|    |             |                         |         | number of trades executed within the        |            |
|    |             |                         |         | ATS on a security-by-security basis.        |            |
|    |             |                         |         | The new regime also requires each           |            |
|    |             |                         |         | individual ATS to use a unique MPID,        |            |
|    |             |                         |         | which can be used only for activity on the  |            |
|    |             |                         |         | ATS, for reporting trades and orders to     |            |
|    |             |                         |         | FINRA. FINRA makes the reported             |            |
|    |             |                         |         | volume and trade count information for      |            |
|    |             |                         |         | equity securities publicly available on its |            |
|    |             |                         |         | website. May 16, 2013 (Commission           |            |
|    |             |                         |         | voted to approve SEF Final Rules), June     |            |
|    |             |                         |         | 11, 2010 (Co-Location NOPR) On June         |            |
|    |             |                         |         | 19, 2012, the Commission issued final       |            |
|    |             |                         |         | rules for Core Principles and Other         |            |
|    |             |                         |         | Requirements for Designated Contract        |            |
|    |             |                         |         | Markets (effective August 20, 2012). In     |            |
|    |             |                         |         | the final rule, the Commission adopted      |            |
|    |             |                         |         | Rule 38.255: Risk Controls for trading.     |            |
|    |             |                         |         | That rule provides that "The designated     |            |
|    |             |                         |         | market must establish and maintain risk     |            |
|    |             |                         |         | control mechanisms to prevent and           |            |
|    |             |                         |         | reduce the potential risk of price          |            |
|    |             |                         |         | distortions and market disruptions"         |            |
|    |             |                         |         | On May 16, 2013, the CFTC voted to          |            |
|    |             |                         |         | approve final rules regarding the Core      |            |
|    |             |                         |         | Principles and Other Requirements for       |            |
|    |             |                         |         | Swap Execution Facilities ("SEF Final       |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                          | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | Rules"). The SEF Final Rules requires a   |            |
|    |             |                         |         | Swap Execution Facility ("SEF") to        |            |
|    |             |                         |         | establish and maintain risk control       |            |
|    |             |                         |         | mechanisms to reduce the potential risk   |            |
|    |             |                         |         | of market disruptions.                    |            |
|    |             |                         |         | Highlight main developments since last    |            |
|    |             |                         |         | year's survey:                            |            |
|    |             |                         |         | Web-links to relevant documents:          |            |
|    |             |                         |         | http://www.sec.gov/marketstructure/       |            |
|    |             |                         |         | http://www.sec.gov/rules/sro/finra/2014/3 |            |
|    |             |                         |         | 4-71341.pdf Proposed Regulation           |            |
|    |             |                         |         | Systems Compliance and Integrity:         |            |
|    |             |                         |         | http://www.sec.gov/rules/proposed/2013/   |            |
|    |             |                         |         | 34-69077.pdf SEC concept release to       |            |
|    |             |                         |         | review the US equity market structure:    |            |
|    |             |                         |         | http://www.sec.gov/rules/concept/2010/3   |            |
|    |             |                         |         | 4-61358.pdf Final Rule on Core            |            |
|    |             |                         |         | Principles and Other Requirements for     |            |
|    |             |                         |         | Designated Contract Markets available at  |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/    |            |
|    |             |                         |         | @lrfederalregister/documents/file/2012-   |            |
|    |             |                         |         | 36612a.pdf Microsoft Word version of      |            |
|    |             |                         |         | Final Rulemaking on Core Principles and   |            |
|    |             |                         |         | Other Requirements for Swap Execution     |            |
|    |             |                         |         | Facilities available at                   |            |
|    |             |                         |         | http://www.cftc.gov/LawRegulation/Dod     |            |
|    |             |                         |         | dFrankAct/Dodd-                           |            |
|    |             |                         |         | FrankFinalRules/index.htm (Federal        |            |
|    |             |                         |         | Register publication pending) CFTC        |            |
|    |             |                         |         | Notice of Proposed Rulemaking on Co-      |            |
|    |             |                         |         | Location/Proximity Hosting Services       |            |

USA

| No | Description | G20/FSB Recommendations | Remarks | Progress to date   | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    | -           |                         |         | available at http://www.cftc.gov/ucm/groups/public/ @lrfederalregister/documents/file/2010- 13613a.pdf |            |



| No    | Description                      | G20/FSB Recommendations   | Remarks  | Progress to date  | Next steps                       |
|-------|----------------------------------|---|--|---|----------------------------------|
| 25    | Regulation and                   | We need to ensure enhanced market   | Jurisdictions should indicate whether  | ☐ Not applicable  | Planned actions (if any):        |
| (25)  | supervision of commodity markets | transparency, both on cash and financial commodity markets, including OTC, and achieve appropriate regulation and   | commodity markets of any type exist in their national markets.  Jurisdictions should indicate the policy   | ☐ Applicable but no action envisaged at the moment  If "Not applicable "or "Applicable but  | Expected commencement date:      |
|       |                                  | supervision of participants in these markets. Market regulators and authorities should be granted effective intervention powers to address disorderly markets and prevent market abuses. In particular, market regulators should have, and use formal position management                       | measures taken to implement the principles found in IOSCO's report on   Principles for the Regulation and  Supervision of Commodity Derivatives  Markets (Sep 2011).  Jurisdictions, in responding to this | no action envisaged" has been selected, please provide a brief justification:  Implementation ongoing or completed:  Issue is being addressed through:  | Web-links to relevant documents: |
|       |                                  | powers, including the power to set exante position limits, particularly in the delivery month where appropriate, among  | recommendation, may also make use of the responses contained in the <i>report</i> published by the IOSCO's Committee on  | <ul> <li>□ Primary / Secondary legislation</li> <li>☑ Regulation / Guidelines</li> <li>☑ Other actions (such as supervisory</li> </ul>  |                                  |
|       |                                  | other powers of intervention. We call on IOSCO to report on the implementation of its recommendations by the end of 2012. (Cannes)  | Commodity Futures Markets based on a survey conducted amongst its members in April 2012 on regulation in commodity derivatives market.   | actions), please specify:  The CFTC's surveillance authority.  Status of progress:  Draft in preparation, expected  |                                  |
| (New) |                                  | We also call on Finance ministers to monitor on a regular basis the proper implementation of IOSCO's principles for the regulation and supervision on commodity derivatives markets and encourage broader publishing and unrestricted access to aggregated open interest data. (St. Petersburg) |  | publication by:  Draft published as of: May 29, 2014 (position limits)  Final rule or legislation approved and will come into force on:  Reform effective (completed) as of: 7/22/2011 (in all other areas)  Short description of the content of the legislation/ regulation/guideline: The CFTC large trader reporting program for |                                  |
|       |                                  |   |  | futures ("LTRP") requires daily reports to<br>the CFTC with respect to commodity<br>futures and options positions held above a<br>CFTC-specified level. On July 22, 2011,   |                                  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                           | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | the CFTC issued final regulations          |            |
|    |             |                         |         | expanding the LTRP to swaps on certain     |            |
|    |             |                         |         | physical commodities. In 2012, a federal   |            |
|    |             |                         |         | court vacated the CFTC's position limits   |            |
|    |             |                         |         | rule. The CFTC in 2014 re-proposed the     |            |
|    |             |                         |         | rule. CEA section 5(d)(8) requires         |            |
|    |             |                         |         | DCMs to publish daily information on       |            |
|    |             |                         |         | settlement prices, volume, open interest,  |            |
|    |             |                         |         | and opening and closing ranges for         |            |
|    |             |                         |         | actively traded contracts on the contract  |            |
|    |             |                         |         | market. CEA section 5(d)(4) requires       |            |
|    |             |                         |         | DCMs to have the capacity and              |            |
|    |             |                         |         | responsibility to prevent manipulation,    |            |
|    |             |                         |         | price distortion, and disruptions of the   |            |
|    |             |                         |         | delivery or cash-settlement process        |            |
|    |             |                         |         | through market surveillance, compliance,   |            |
|    |             |                         |         | and enforcement practices and              |            |
|    |             |                         |         | procedures. CEA section 5(d)(9) requires   |            |
|    |             |                         |         | DCMs to provide a competitive, open and    |            |
|    |             |                         |         | efficient market and mechanism for         |            |
|    |             |                         |         | executing transactions that protects price |            |
|    |             |                         |         | discovery process of trading in the        |            |
|    |             |                         |         | centralized market of the DCM. To the      |            |
|    |             |                         |         | extent that SEFs offer commodity swaps     |            |
|    |             |                         |         | for trading, CEA section 5h(f)(4) requires |            |
|    |             |                         |         | the SEF to monitor trading in swaps to     |            |
|    |             |                         |         | prevent manipulation, price distortion,    |            |
|    |             |                         |         | and disruptions of the delivery or cash    |            |
|    |             |                         |         | settlement process. CEA section 5h(f)(9)   |            |
|    |             |                         |         | requires the SEF to publicize information  |            |
|    |             |                         |         | on price, trading, volume, and other       |            |
|    |             |                         |         | trading data on swaps. On May 16, 2013,    |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                           | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | the CFTC adopted final SEF rules. CEA      |            |
|    |             |                         |         | section 2(a)(13)(G) requires all swaps,    |            |
|    |             |                         |         | including commodity swaps, to be           |            |
|    |             |                         |         | reported to a trade repository ("SDR").    |            |
|    |             |                         |         | CEA section 21(b) directs the CFTC to      |            |
|    |             |                         |         | prescribe standards for swap data          |            |
|    |             |                         |         | reporting and requires SDRs to provide     |            |
|    |             |                         |         | direct access to the CFTC. On January      |            |
|    |             |                         |         | 13, 2012, the CFTC issued final rules      |            |
|    |             |                         |         | establishing requirements for reporting    |            |
|    |             |                         |         | swaps data to an SDR. For swaps            |            |
|    |             |                         |         | executed on a SEF or DCM, data is to be    |            |
|    |             |                         |         | reported by the SEF or DCM to the SDR.     |            |
|    |             |                         |         | CEA section 2(a)(13) establishes           |            |
|    |             |                         |         | standards and requirements for the real-   |            |
|    |             |                         |         | time reporting and public availability of  |            |
|    |             |                         |         | certain swap transaction and pricing data. |            |
|    |             |                         |         | On January 9, 2012, the CFTC issued        |            |
|    |             |                         |         | final rules implementing a framework for   |            |
|    |             |                         |         | real-time reporting of swap transaction    |            |
|    |             |                         |         | data.                                      |            |
|    |             |                         |         | Highlight main developments since last     |            |
|    |             |                         |         | year's survey:                             |            |
|    |             |                         |         | Web-links to relevant documents:           |            |
|    |             |                         |         | CFTC Proposed Rule on Position Limits      |            |
|    |             |                         |         | for Derivatives and Aggregation of         |            |
|    |             |                         |         | Positions, available at                    |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/     |            |
|    |             |                         |         | @lrfederalregister/documents/file/2014-    |            |
|    |             |                         |         | 12427a.pdf CFTC Final Rule on Large        |            |
|    |             |                         |         | Trader Reporting for Physical              |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                         | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | Commodity Swaps available at             |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/   |            |
|    |             |                         |         | @lrfederalregister/documents/file/2011-  |            |
|    |             |                         |         | 18054a.pdf The Commodity Exchange        |            |
|    |             |                         |         | Act available at                         |            |
|    |             |                         |         | http://www.law.cornell.edu/uscode/html/  |            |
|    |             |                         |         | uscode07/usc_sup_01_7_10_1.html          |            |
|    |             |                         |         | CFTC Final Rule on Swap Data             |            |
|    |             |                         |         | Recordkeeping and Reporting              |            |
|    |             |                         |         | Requirements available at                |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/   |            |
|    |             |                         |         | @lrfederalregister/documents/file/2011-  |            |
|    |             |                         |         | 33199a.pdf CFTC Final Rule on Real       |            |
|    |             |                         |         | Time Public Reporting of Swap            |            |
|    |             |                         |         | Transaction Data available at            |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/   |            |
|    |             |                         |         | @lrfederalregister/documents/file/2011-  |            |
|    |             |                         |         | 33173a.pdf Compliance Date and Time      |            |
|    |             |                         |         | Delay Phase Ins for Real Time Reporting: |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/   |            |
|    |             |                         |         | @newsroom/documents/file/phasein_real    |            |
|    |             |                         |         | time.pdf Appendix C – Time Delays for    |            |
|    |             |                         |         | Public Dissemination:                    |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/   |            |
|    |             |                         |         | @newsroom/documents/file/tdpdissemina    |            |
|    |             |                         |         | tion.pdf CFTC Final Rulemaking on        |            |
|    |             |                         |         | Procedures to Establish Appropriate      |            |
|    |             |                         |         | Minimum Block Sizes for Large Notional   |            |
|    |             |                         |         | Off-Facility Swaps and Block Trades:     |            |
|    |             |                         |         | http://www.cftc.gov/LawRegulation/Dod    |            |
|    |             |                         |         | dFrankAct/Rulemakings/DF_18_RealTi       |            |
|    |             |                         |         | meReporting/ssLINK/2013-12133a           |            |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                         | Next steps |
|----|-------------|-------------------------|---------|--|------------|
|    |             |                         |         | Breakdown of Notional Caps for Real      |            |
|    |             |                         |         | Time Reporting:                          |            |
|    |             |                         |         | http://www.cftc.gov/ucm/groups/public/   |            |
|    |             |                         |         | @newsroom/documents/file/rtr_notionalc   |            |
|    |             |                         |         | aps.pdf CFTC Final Rulemaking on Core    |            |
|    |             |                         |         | Principles and Other Requirements for    |            |
|    |             |                         |         | Designated Contract Markets available at |            |
|    |             |                         |         | http://www.cftc.gov/LawRegulation/Dod    |            |
|    |             |                         |         | dFrankAct/Rulemakings/DF_12_DCMRu        |            |
|    |             |                         |         | les/ssLINK/2012-12746 CFTC Final         |            |
|    |             |                         |         | Rulemaking on Core Principles and Other  |            |
|    |             |                         |         | Requirements for Swap Execution          |            |
|    |             |                         |         | Facilities available at                  |            |
|    |             |                         |         | http://www.cftc.gov/LawRegulation/Dod    |            |
|    |             |                         |         | dFrankAct/Rulemakings/DF_13_SEFRul       |            |
|    |             |                         |         | es/ssLINK/2013-12242                     |            |



| No     | Description         | G20/FSB Recommendations                    | Remarks                                  | Progress to date | Next steps |
|--------|---------------------|--|--|------------------|------------|
| 26     | Reform of financial | We support the establishment of the        | Collection of information on this        |                  |            |
| (New)  | benchmarks          | FSB's Official Sector Steering Group to    | recommendation will be deferred to the   |                  |            |
| (IVCW) |                     | coordinate work on the necessary reforms   | 2015 IMN survey given the ongoing        |                  |            |
|        |                     | of financial benchmarks. We endorse        | policy work in this area, the reviews of |                  |            |
|        |                     | IOSCO's Principles for Financial           | interest rate and foreign exchange       |                  |            |
|        |                     | Benchmarks and look forward to reform      | benchmarks during 2014, and the recent   |                  |            |
|        |                     | as necessary of the benchmarks used        | publication of IOSCO's Principles for    |                  |            |
|        |                     | internationally in the banking industry    | Financial Benchmarks.                    |                  |            |
|        |                     | and financial markets, consistent with the |  |                  |            |
|        |                     | IOSCO Principles. (St. Petersburg)         |  |                  |            |
|        |                     |  |  |                  |            |
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| No  | Description            | G20/FSB Recommendations | Remarks   | Progress to date   | Next steps   |
|-----|------------------------|-------------------------|---|--|--|
| XI. | Enhancing financial co | onsumer protection      |   |  |  |
|     | <u> </u>               |                         | Jurisdictions should describe progress toward implementation of the OECD's G-20 high-level principles on financial consumer protection (Oct 2011).  Jurisdictions may also refer to OECD's update report including the Annex to the report on effective approaches to support the implementation of the High-level Principles based around the following three priority principles:  Disclosure and transparency  Responsible business conduct of financial services providers and their authorised agents  Complaints handling and redress | □ Not applicable □ Applicable but no action envisaged at the moment  If "Not applicable " or "Applicable but no action envisaged" has been selected, please provide a brief justification: □ Implementation ongoing or completed:  Issue is being addressed through: □ Primary / Secondary legislation □ Regulation / Guidelines □ Other actions (such as supervisory actions), please specify:  Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Reform effective (completed) as of: 7/21/2011  Short description of the content of the legislation/ regulation/guideline: The | Planned actions (if any):  Expected commencement date:  Web-links to relevant documents: |
|     |                        |                         |   | <ul> <li>☑ Reform effective (completed) as of: 7/21/2011</li> <li>Short description of the content of the</li> </ul>   |  |



| No | Description | G20/FSB Recommendations | Remarks | Progress to date                              | Next steps |
|----|-------------|-------------------------|---------|---|------------|
|    |             |                         |         | The Act consolidated responsibility for       |            |
|    |             |                         |         | regulation of financial services (and the     |            |
|    |             |                         |         | associated rule-making) to protect            |            |
|    |             |                         |         | consumers. The Act also charged the           |            |
|    |             |                         |         | CFPB with conducting and making public        |            |
|    |             |                         |         | studies on several consumer protection        |            |
|    |             |                         |         | related issues associated with specific       |            |
|    |             |                         |         | financial services, including remittances     |            |
|    |             |                         |         | and credit scores. The Act also gave the      |            |
|    |             |                         |         | CFPB responsibility for consumer              |            |
|    |             |                         |         | protections supervision of large deposit-     |            |
|    |             |                         |         | taking institutions (>\$10 billion in         |            |
|    |             |                         |         | assets), large non-deposit-taking             |            |
|    |             |                         |         | institutions active in the offering financial |            |
|    |             |                         |         | services to consumers, and all non-           |            |
|    |             |                         |         | deposit-taking institutions providing         |            |
|    |             |                         |         | mortgages and mortgage related services,      |            |
|    |             |                         |         | student loans, and payday lenders.            |            |
|    |             |                         |         | Highlight main developments since last        |            |
|    |             |                         |         | year's survey:                                |            |
|    |             |                         |         | Web-links to relevant documents:              |            |
|    |             |                         |         | http://www.consumerfinance.gov/regulati       |            |
|    |             |                         |         | ons   |            |
|    |             |                         |         |   |            |
|    |             |                         |         |   |            |
|    |             |                         |         |   |            |
|    |             |                         |         |   |            |



#### XII. Source of recommendations:

St Petersburg: The G20 Leaders' Declaration (5-6 September 2013)

Los Cabos: The G20 Leaders' Declaration (18-19 June 2012)

Cannes: The Cannes Summit Final Declaration (3-4 November 2011)

Seoul: The Seoul Summit Document (11-12 November 2010)

Toronto: The G-20 Toronto Summit Declaration (26-27 June 2010)

Pittsburgh: Leaders' Statement at the Pittsburgh Summit (25 September 2009)

London: The London Summit Declaration on Strengthening the Financial System (2 April 2009)

Washington: The Washington Summit Action Plan to Implement Principles for Reform (15 November 2008)

FSF 2008: The FSF Report on Enhancing Market and Institutional Resilience (7 April 2008)

FSF 2009: The FSF Report on Addressing Procyclicality in the Financial System (2 April 2009)

FSB 2009: The FSB Report on Improving Financial Regulation (25 September 2009)

FSB 2012: The FSB Report on Increasing the Intensity and Effectiveness of SIFI Supervision (1 November 2012)



#### XIII. <u>List of Abbreviations used:</u>

ABS: Asset Backed Securities

ATS: alternative trading system

C6: IOSCO Committee on Credit Rating Agencies - Committee 6

CEA: Commodity Exchange Act

CCR: counterparty credit risk

CFPB: Consumer Financial Protection Bureau

CFTC: U.S. Commodity Futures Trading Commission

CICI: CFTC Interim Compliant Identifier

CMG: Crisis Management Group

DCM: Designated Contract Market

Dodd-Frank Act: Dodd-Frank Wall Street Reform and Consumer Protection Act

Exchange Act: The Securities Exchange Act of 1934

FASB: Financial Accounting Standards Board

FSB: Financial Stability Board

FSOC: U.S. Financial Stability Oversight Council

G-SIFIs: Global Systemically Important Financial Institutions

IFRS: International Financial Reporting Standards

IOSCO: International Organization of Securities Commissions

LTRP: Large trader reporting program for futures

MSBSPs: major security-based swap participants

MSPs: major swap participants

NAIC: National Association of Insurance Commissioners

NMS: national market system

NRSROs: nationally recognized statistical rating organizations

Rating Agency Act: Credit Rating Agency Reform Act of 2006

SBSDs: security-based swap dealers

SCAV: FSB Standing Committee on the Assessment of Vulnerabilities

SDs: swap dealers

SDR: Swap Data Repository

SEC: U.S. Securities and Exchange Commission

SEF: Swap Execution Facility

SEF NOPR: Notice of Proposed Rulemaking on Core Principles and Other

Requirements for Swap Execution Facilities

U.S. GAAP: U.S. generally accepted accounting principles