Notice of Reliance on Substituted Compliance by 28/10/2021 Drew Shoemaker Switzerland Rule Category Sub-Category Rule(s) Substituted Compliance If "Yes" in Column E, description of scope limitation Any limitations to the Order Section scope of the reliance on (e.g. for entity-level rules, identify the SBS business that is eligible for substituted compliance, and for substituted compliance? [Yes/leave blank] transaction level rules, indicate the class of ransactions, such as "transactions with French ounterparties") [otherwise leave blank] Risk Control Requirements Internal Risk Management Exchange Act section (b)(1) 15F(j)(2) and Exchange Act rules 15Fh-3(h)(2)(iii)(I) Trade Acknowledgment Exchange Act section (b)(2) 15F(i) and Exchange Act and Verification rule 15Fi-2 **Portfolio Reconciliation Exchange Act section** (b)(3) 15F(i) and Exchange Act rules 15Fi-3 Portfolio Compression Exchange Act section (b)(4) 15F(i) and Exchange Act rules 15Fi-4 Internal Supervision and Internal Supervision **Exchange Act section** (c)(1), (3), (4) Compliance (including conflicts of 15F(j)(4)(A) and (j)(5) and Interest) Exchange Act rule 15Fh-3(h) Recordkeeping and Record Creation Exchange Act rule 18a-(d)(1)(i)(A), (ii)(A) 5(b)(1) [blotters] Reporting Exchange Act rule 18a-Record Creation (d)(1)(i)(B), (ii)(A) 5(b)(2) [customer account ledgers] Record Creation Exchange Act rule 18a-(d)(1)(i)(C), (ii)(A) 5(b)(3) [securities record/ledger] Exchange Act rule 18a-Record Creation (d)(1)(i)(D) 5(b)(4) [memo of broker order] **Record Creation** Exchange Act rule 18a-(d)(1)(i)(E) 5(b)(5) [memo of purchase and sale] **Record Creation** Exchange Act rule 18a-(d)(1)(i)(F) 5(b)(6) [confirm/trade acknowledgment, verification] and (b)(11) if applicable Exchange Act rule 18a-Record Creation (d)(1)(i)(G), (ii)(A) 5(b)(7) [counterparty info] Record Creation Exchange Act rule 18a-(d)(1)(i)(l) Sub-comp under (f)(1)(i)(M) will apply only in respect 5(b)(13) [business conduct to Internal Supervision rules. standards. CCO requirements] **Record Creation** Exchange Act rule 18a-(d)(1)(i)(J) 5(b)(14)(i) and (ii) [port rec 1 Record Creation Exchange Act rule 18a-(d)(1)(i)(K) 5(b)(14)(iii) [portfolio compression] **Record Maintenance** Exchange Act rule 18a-(d)(2)(i)(A), (ii) (including rules on 6(a)(2) [retention for electronic recordkeeping certain records at least 6 and third party years, 2 in easily contractors) accessible place] **Record Maintenance** Exchange Act rule 18a-(d)(2)(i)(B), (ii) 6(b)(2)(i)[retention for certain records at least 3 vears. 2 in easily accessible place] Record Maintenance Exchange Act rule 18a-(d)(2)(i)(C), (ii) 6(b)(2)(ii) [retention for communications] Record Maintenance Exchange Act rule 18a-(d)(2)(i)(D), (ii) 6(b)(2)(iii) [retention for guarantees etc.] Record Maintenance Exchange Act rule 18a-(d)(2)(i)(E), (ii) 6(b)(2)(iv) [retention for written business agreements etc.]

Record Maintenance	Exchange Act rule 18a-	(d)(2)(i)(F), (ii)	Υ	Sub-comp under (f)(2)(i)(K) will apply only in respect
	6(b)(2)(vii) [retention for business conduct records, political contributions,			to Internal Supervision rules
	CCO requirements]			
Record Maintenance	Exchange Act rule 18a-6(c) [lifetime preservation of licenses etc.]	(d)(2)(i)(G), (ii)		
Record Maintenance	Exchange Act rule 18a- 6(d)(2)(ii) [retention for exam reports etc.]	(d)(2)(i)(I), (ii)		
Record Maintenance	Exchange Act rule 18a- 6(d)(3)(ii) [retention for SBS manuals]	(d)(2)(i)(J), (ii)		
Record Maintenance	Exchange Act rule 18a- 6(d)(4) and (d)(5) [retention for portfolio reconciliation, compression, relationship docs and related audit]	(d)(2)(i)(K), (ii)		
Record Maintenance	Exchange Act rule 18a-6(e) [use of electronic storage system]	(d)(2)(i)(L), (ii)		
Record Maintenance	Exchange Act rule 18a-6(f) [third party storage, written undertaking]	(d)(2)(i)(M), (ii)		
Daily Trading Records	Exchange Act section 15F(g)	(d)(5)		
Financial Reports	Exchange Act rule 18a- 7(a)(2), and the requirements of Exchange Act rule 18a-7(j) as applied to the requirements of Exchange Act rule 18a-7(a)(2)	(d)(3)		
Notifications	Exchange Act rule 18a-8(c) and the requirements of Exchange Act rule 18a-8(h) as applied to the requirements of Exchange Act rule 18a-8(c) [notice of adjustment to reported capital category]			