## Notice of Reliance on Substituted Compliance by:

	11/1/2021	Shoemaker Drew	United Kingdom						
specific s	substituted compliance de	eterminations in the Order for which the Covered Entity intends to	apply substituted compliance						
Sub-	b-Category	Rule(s)	Substituted Compliance Order Section	compliance? [Yes/leave blank]	If "Yes" in Column E, description of scope limitation (e.g. for entity-level rules, identify the SBS business that is eligible for substituted compliance, and for transaction level rules, indicate the class of transactions, such as "transactions with French counterparties") [otherwise leave blank]				
Inter		Exchange Act section 15F(j)(2) and Exchange Act rules 15Fh-3(h)(2)(iii)(I)	(b)(1)						
	ade Acknowledgment and rification	Exchange Act section 15F(i) and Exchange Act rule 15Fi-2	(b)(2)						
	rtfolio Reconciliation and spute Reporting	Exchange Act section 15F(i) and Exchange Act rules 15Fi-3	(b)(3)						
Portf	rtfolio Compression	Exchange Act section 15F(i) and Exchange Act rules 15Fi-4	(b)(4)						
	ading Relationship cumentation	Exchange Act section 15F(i) and Exchange Act rules 15Fi-5	(b)(5)						
(inclu Inter	ernal Supervision cluding conflicts of erest)	Exchange Act section 15F(j)(4)(A) and (j)(5) and Exchange Act rule 15Fh-3(h)	(d)(1), (3), (4)						
Knov	ow your Counterparty	Exchange Act rule 15Fh-3(e)	(e)(3)						
l Reco	cord Creation	Exchange Act rule 18a-5(b)(1) [blotters]	(f)(1)(i)(A), (ii)(A)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(2) [customer account ledgers]	(f)(1)(i)(C), (ii)(A)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(3) [securities record/ledger]	(f)(1)(i)(D), (ii)(A)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(4) [memo of broker order]	(f)(1)(i)(E)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(5) [memo of purchase and sale]	(f)(1)(i)(F)						
	cord Creation	Exchange Act rule 18a-5(b)(6) [confirm/trade acknowledgment, verification] and (b)(11) if applicable	(f)(1)(i)(G)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(7) [counterparty info]	(f)(1)(i)(H), (ii)(A)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(8) [AP questionnaire etc.]	(f)(1)(i)(K)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(13) [business conduct standards, CCO requirements]	(f)(1)(i)(M), (ii)(B)	Υ	Sub-comp under (f)(1)(i)(M) will apply only in respect to Know Your Customer and Internal Supervision rules.				
Reco	cord Creation	Exchange Act rule 18a-5(b)(14)(i) and (ii) [port rec and valuation disputes]	(f)(1)(i)(N)						
Reco	cord Creation	Exchange Act rule 18a-5(b)(14)(iii) [portfolio compression]	(f)(1)(i)(O)						
(incluelect	cord Maintenance cluding rules on ectronic recordkeeping d third party contractors)	Exchange Act rule 18a-6(a)(2) [retention for certain records at least 6 years, 2 in easily accessible place]	(f)(2)(i)(A), (ii)						
Reco	cord Maintenance	Exchange Act rule 18a-6(b)(2)(i)[retention for certain records at least 3 years, 2 in easily accessible place]	(f)(2)(i)(B), (ii)						
Reco	cord Maintenance	Exchange Act rule 18a-6(b)(2)(ii) [retention for communications]	(f)(2)(i)(D), (ii)						
Reco	cord Maintenance	Exchange Act rule 18a-6(b)(2)(iii) [retention for guarantees etc.]	(f)(2)(i)(F), (ii)						
Reco	cord Maintenance	Exchange Act rule 18a-6(b)(2)(iv) [retention for written business agreements etc.]	(f)(2)(i)(G), (ii)						
Reco	cord Maintenance	Exchange Act rule 18a-6(b)(2)(vii) [retention for business conduct records, political contributions, CCO requirements]	(f)(2)(i)(K), (ii)	Υ	Sub-comp under (f)(2)(i)(K) will apply only in respect to Know Your Customer and Internal Supervision rules				
Reco	cord Maintenance	Exchange Act rule 18a-6(c) [lifetime preservation of licenses etc.]	(f)(2)(i)(L), (ii)						
Reco	cord Maintenance	Exchange Act rule 18a-6(c) [lifetime preservation of licenses etc.]	(f)(	2)(i)(L), (ii)	2)(i)(L), (ii)				

Record Maintenance	Exchange Act rule 18a-6(d)(1) [retention for employee docs]	(f)(2)(i)(M), (ii)	
Record Maintenance	Exchange Act rule 18a-6(d)(2) [retention for exam reports etc.]	(f)(2)(i)(N), (ii)	
Record Maintenance	Exchange Act rule 18a-6(d)(3) [retention for SBS manuals]	(f)(2)(i)(O), (ii)	
Record Maintenance	Exchange Act rule 18a-6(d)(4)-(d)(5) [retention for portfolio reconciliation, compression, relationship docs and related audit]	(f)(2)(i)(P), (ii)	
Record Maintenance	Exchange Act rule 18a-6(e) [use of electronic storage system]	(f)(2)(i)(Q), (ii)	
Record Maintenance	Exchange Act rule 18a-6(f) [third party storage, written undertaking]	(f)(2)(i)(R), (ii)	
Daily Trading Records	Exchange Act section 15F(g)	(f)(6)	
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)	(f)(3)(i)	
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]		