

44. Attach as Exhibit EE, policies and procedures implemented by the applicant to prevent any provision in a valid security-based swap from being invalidated or modified through the procedures or operations of the applicant.

As described in Exhibit Q, DDR has engaged its service provider to implement policies and procedures and oversee system access, permissions and controls at an enterprise level. Access to the DDR System is logged, providing an audit trail.

The SDR process is an end-to-end straight through process. From the receipt of data, processing and maintenance of data, and dissemination of data, processes are automated and do not require manual intervention. This straight through processing model is a key mitigant to modification or invalidation of any data.

As a further control, periodic checks of key data elements on submission messages to the corresponding outbound regulator reports are performed.