DRAFT 8/9/2013

INSTRUCTIONS FOR THE PREPARATION OF THE

Country Exposure Information Report

FFIEC 009a (Effective December 2013)

General Instructions

This report is a supplement to the Country Exposure Report (Form FFIEC 009) filed with the banking regulatory agencies for bank examination purposes. The purpose of the Country Exposure Information Report is to provide public disclosure of significant country exposures of U.S. banking institutions. Copies of the report are available to the public by accessing the following website http:/www.ffiec.gov/E16.htm.

Who Must Report

This report must be filed by every institution that submits Form FFIEC 009 and that has exposure meeting the reporting requirements for Form FFIEC 009a as defined in these instructions.

This supplemental disclosure report (Form FFIEC 009a) has two parts: Part A and Part B. Part A will be completed when exposure, as defined for Column 4, Part A, to a single country, excluding the United States, exceeds one percent of the banking institution's total assets or exceeds 20 percent of the banking institution's total capital, whichever is less. All columns included in Part A should only be completed for the countries that exceed these thresholds. Part B will be used to report the names of the countries where the amount of exposure exceeds 0.75 percent but does not exceed 1 percent of the banking institution's total assets or is between 15 percent and 20 percent of the banking institution's total capital, whichever is less. The banking institution must only list the names of the countries and the aggregate amount of exposure for all countries listed under Part B. For the purposes of meeting these criteria, exposure is defined as the amount of total claims computed in accordance with the instructions to Column 4, Part A.

Total assets of reporting banks are those submitted on the Report of Condition to the federal bank supervisors as of the same date. For bank holding companies total assets are those submitted on the most recent Form FR Y-9.

Total capital is as defined in the agencies' guidelines on capital adequacy and consists of Tier 1 plus Tier 2 capital.

Confidentiality

The individual FFIEC 009a reports are made publicly available and do not receive confidential treatment.

Filing of Reports

The report is to be prepared quarterly, as of the last calendar day of March, June, September, and December. All respondents should submit their completed report, each quarter they meet the reporting requirements, to the Federal Reserve Bank of New York (FRBNY), via the Federal Reserve System's

Reporting Central system, within 45 calendar days after the March 31, June 30, and September 30 as-of date. The submission deadline is 50 calendar days after the December 31 as-of date.

Any FFIEC 009a respondent who needs filing guidance is encouraged to visit the Federal Reserve System Website *http://www.frbservices.org/centralbank/index.html* for additional information on Reporting Central. The Website also includes a link that respondents may use to contact the Federal Reserve Bank of New York.

Rounding

Round all amounts reported on this form to the nearest million dollars.

Part A

Country

The countries listed in Part A should be those where exposure, as defined for Column 4, Part A, exceeds 1 percent of total assets or 20 percent of total capital, whichever is less. The names of the countries reported should be as they appear on Form FFIEC 009. The United States should be excluded from this report.

Column 1: Amount of Cross-border Claims Outstanding After Mandated Adjustments for Transfer of Exposure (excluding derivative products)

For each country line reportable on the FFIEC 009a report, report in Column 1 the sum of Columns 1 through 5 from Schedule C, Part II, of the FFIEC 009 report.

Column 2: Amount of Foreign–Office Claims on Local Residents (excluding derivative products)

For each country line reportable on the FFIEC 009a report, report in Column 2 the sum of Columns 6 through 10 from Schedule C, Part II, of the FFIEC 009 report.

Column 3: Amount of Gross Claims Outstanding from Derivative Products after Mandated Adjustments for Transfer of Exposure

List the total amount claims from derivative products: From the FFIEC 009 report, Column 5 of Schedule D.

Column 4: Total Amount of Cross-Border Claims and Foreign–Office Claims on Local Residents

Total of Columns 1 through 3.

Column 5: Gross Foreign-Office Liabilities

List the total amount of gross foreign-office liabilities as reported on the FFIEC 009 report, Columns 1 and 2 of Schedule L. Note that Columns 1 and 2 of Schedule L include foreign-office liabilities to both local and non-local residents.

Columns 6 to 14: Distribution of Amounts Outstanding in Columns 1 and 2 (except Column 13)

Column 6 - Banks

Report the amounts included in Columns 1 and 2 of this report where the counterparties are banks, as defined in Section II.D.1 of the FFIEC 009 instructions. These amounts are included on FFIEC 009 report on Schedule C, Part II, Columns 1 and 6, and Schedule D, Column 1.

Column 7 - Public

Report the amounts included in Columns 1 and 2 of this report where the counterparties are public organizations, as defined in Section II.D.2 of the FFIEC 009 instructions. These amounts are included on FFIEC 009 report on Schedule C, Part II, Columns 2 and 7, and Schedule D, Column 2.

Column 8 - Non-Bank Financial Institutions (NBFIs)

Report the amounts included in Columns 1 and 2 of this report where the counterparties are NBFIs, as defined in Section II.D.3 of the FFIEC 009 instructions. These amounts are included on FFIEC 009 report on Schedule C, Part II, Columns 3 and 8, and Schedule D, Column 3.

Column 9 - Other

Report the amounts included in Columns 1 and 2 of this report where the counterparties cannot be classified as Banks, Public or NBFIs (see Section II.D.6 of the FFIEC 009 instructions). These amounts are included on the FFIEC 009 report on Schedule C, Part II, Columns 4, 5, 9 and 10, and Schedule D, Column 4.

Columns 10 and 11 - By Maturity

For each country, distribute the amounts reported in Columns 1 and 2 according to time remaining to maturity as defined in Section IV.A of the FFIEC 009 instructions: One Year and Under (Column 10) and Over One Year (Column 11).

In completing Columns 10 and 11, estimates may be used.

Columns 12 and 13 - Trading Assets

For each country, distribute the amounts reported in Columns 1 and 2 that are claims classified as held for trading. The amounts are included on the FFIEC 009 report on Schedule C, Part II, Column 17.

In Column 13, report amounts included on the FFIEC 009 report on Schedule C, Part II, Column 18 that represent short positions in the same securities, at the issuer (on a legal entity basis) and instrument level (i.e., debt versus debt and equity versus equity) as the long positions reported in Column 12 of this report.

Column 14 - Securities (HTM and AFS)

For each country, distribute the amounts reported in Columns 1 and 2 that represent securities that the reporter owns and that are classified as held-to-maturity or available-for-sale. These amounts are included on the FFIEC 009 report on Schedule C, Part II, Column 12.

Columns 15 to 18: Collateral Held Against Claims with No Risk Transfers

Columns 15 through 18 below are to be reported based on the location of the counterparty and are not mutually-exclusive.

In Column 15, report for each country claims included in Columns 1 and 2 that represent claims for which the obligor provided collateral that did not meet the definition of collateral for risk-transfers of claims, namely through resale agreements, securities lending arrangements and other similar financing agreements. This amount is included on the FFIEC 009 report on Schedule C, Part II, Column 13.

In Column 16, report for each country the amounts included in Column 15 of this report where the collateral provided was cash. This amount is included on the FFIEC 009 report on Schedule C, Part II, Column 14.

In Column 17, report for each country the amounts included in Column 15 where the holder of the cash collateral or the issuer of the securities provided for collateral are in the same country as the counterparty to the transaction. This amount is included on the FFIEC 009 report on Schedule C, Part II, Column 15.

In Column 18, report for each country the amounts included in Column 15 that represent claims resulting from resale agreements, securities lending transaction, or similar financing agreements. This amount is included on the FFIEC 009 report on Schedule C, Part II, Column 16.

Columns 19 and 20: Cross-Border and Foreign-Office Commitments and Guarantees

Column 19 - Unused Commitments

Report for each country the amounts included on the FFIEC 009 report on Schedule O, Column 1, that represent unused commitments. See Section VII.A for additional details.

Column 20 - Guarantees (Excluding Credit Derivatives Sold)

Report for each country the amounts included on the FFIEC 009 report on Schedule O, Column 2, that represent legally binding guarantees and insurance contracts issued by the reporter's U.S. or foreign offices for which the ultimate obligor is not a U.S. resident, excluding credit derivatives sold. Reporting should be done based on the location of the ultimate obligor.

Columns 21 through 24: Credit Derivatives (By Reference Entity)

Columns 21 and 22 - Gross-Gross

Report in Column 21, by country of the underlying reference asset, the notional value of total credit derivatives purchased. The amounts are included on the FFIEC 009 report on Schedule O, Column 3.

Report in Column 22, by country of the underlying reference asset, the notional value of total credit derivatives sold. The amounts are included on the FFIEC 009 report on Schedule O, Column 4.

Columns 23 and 24 - Gross-Net

Report in Columns 23 and 24, as appropriate, the consolidated net position of credit derivative contracts included in Columns 21 and 22. Netting should be done as specified in Section VII.C.2 of the FFIEC 009 instructions. The amounts are included on the FFIEC 009 report on Schedule O, Columns 5 and 6.

Part B

Provide the name of each country not listed in Part A where the institution has exposure, as defined for Column 4 of Part A, which exceeds 0.75 percent but does not exceed 1 percent of the reporting institution's assets or is between 15 percent and 20 percent of its total capital, whichever is less. In the box provided, give the total amount of exposure to all of the countries listed in Part B.

Optional Management Statement Concerning the Country Risk Information Reported On FFIEC 009a

The management of the reporting institution may, if it wishes, submit a brief statement concerning the data submitted on this report. This statement may be used by management to explain any differences between the information contained in this report and information filed with the Securities and Exchange Commission pursuant to U.S. securities laws, or to provide any other information concerning the data that management believes would further public understanding of the reporting institutions country exposure. All information in the narrative statement must be accurate and not misleading. Appropriate efforts shall be taken by the filing institution to ensure the statement's accuracy.

As this optional statement will be made available to the public as submitted, institutions choosing to submit it should ensure that the statement does not contain information that they are not willing to have made public or that would compromise the privacy of their customers.

The optional statement should be entered in the remarks section of the Reporting Central application.

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