

BrokerCheck Report

BNP PARIBAS PRIME BROKERAGE, INC.

CRD# 24962

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

• **Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.



BNP PARIBAS PRIME BROKERAGE, INC.

CRD# 24962

SEC# 8-40490

Main Office Location

787 7TH AVENUE
NEW YORK, NY 10019

Mailing Address

525 WASHINGTON BLVD
5TH FLOOR
JERSEY CITY, NJ 07310

Business Telephone Number

212-471-6768

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a corporation.
This firm was formed in Delaware on 08/23/1982.
Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This brokerage firm is no longer registered with FINRA or a national securities exchange.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm?

Yes

The following types of disclosures have been reported:

Type	Count
Regulatory Event	18
Bond	1

The number of disclosures from non-registered control affiliates is 15

Registration Withdrawal Information

This section provides information relating to the date the brokerage firm ceased doing business and the firm's financial obligations to customers or other brokerage firms.



Date firm ceased business: 03/12/2018

Does this brokerage firm owe any money or securities to any customer or brokerage firm? No



Firm Profile

This firm is classified as a corporation.

This firm was formed in Delaware on 08/23/1982.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

BNP PARIBAS PRIME BROKERAGE, INC.

Doing business as BNP PARIBAS PRIME BROKERAGE, INC.

CRD# 24962

SEC# 8-40490

Main Office Location

787 7TH AVENUE
NEW YORK, NY 10019

Mailing Address

525 WASHINGTON BLVD
5TH FLOOR
JERSEY CITY, NJ 07310

Business Telephone Number

212-471-6768



Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	BNP PARIBAS US WHOLESALE HOLDINGS, CORP
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	OWNER
Position Start Date	10/2008
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	ALTER, ANDREW WILLIAM 4183449
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF LEGAL OFFICER AND SECRETARY
Position Start Date	10/2009
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	COZINE, DANNY 4454984
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	09/2014

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): D'ILLIERS, BRUNO
5932836

Is this a domestic or foreign entity or an individual? Individual

Position DIRECTOR

Position Start Date 06/2011

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): FARRELL, MICHAEL F
2562352

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF FINANCIAL OFFICER, FINOP

Position Start Date 12/2017

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Legal Name & CRD# (if any): GALLAGHER, CLAUDINE

Firm Profile



Direct Owners and Executive Officers (continued)

6023604

Is this a domestic or foreign entity or an individual? Individual

Position DIRECTOR

Position Start Date 12/2016

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

Legal Name & CRD# (if any): HAWLEY, ROBERT WILLIAM JR
828024

Is this a domestic or foreign entity or an individual? Individual

Position DIRECTOR

Position Start Date 04/2014

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): HAWLEY, ROBERT WILLIAM JR
828024

Is this a domestic or foreign entity or an individual? Individual

Position CHAIRMAN

Position Start Date 09/2017

Percentage of Ownership Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): LIST, LAWRENCE HARRIS
2713411

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF OPERATING OFFICER

Position Start Date 03/2017

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): LOWE, JEFFREY CRAIG
4820729

Is this a domestic or foreign entity or an individual? Individual

Position PRESIDENT & DIRECTOR

Position Start Date 04/2015

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): MARTINO, MICHAEL BENEDICT
4420944

Firm Profile



Direct Owners and Executive Officers (continued)

Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF OPERATIONS OFFICER
Position Start Date	09/2017
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any): SPEAL, EDWARD NICHOLAS
2122359

Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	09/2012
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any): WYNN, HOWARD M
5836243

Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER
Position Start Date	12/2016
Percentage of Ownership	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No



Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any): BNP PARIBAS

Is this a domestic or foreign entity or an individual? Foreign Entity

Company through which indirect ownership is established BNP PARIBAS USA, INC.

Relationship to Direct Owner SHAREHOLDER

Relationship Established 10/2008

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): BNP PARIBAS USA, INC.

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established BNP PARIBAS US WHOLESALE HOLDINGS, CORP

Relationship to Direct Owner SHAREHOLDER

Relationship Established 10/2008

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.



Firm Operations



Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is no longer registered.

The firm's registration was from 01/09/1989 to 07/19/2018.



Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 2 types of businesses.

Types of Business

Exchange member engaged in exchange commission business other than floor activities

Other - PRIME BROKERAGE BUSINESS

Other Types of Business

This firm does effect transactions in commodities, commodity futures, or commodity options.

This firm does engage in other non-securities business.

Non-Securities Business Description: MARGIN LENDING AND SWAPS
FUTURES COMMISSION MERCHANT (FCM)

Firm Operations



Clearing Arrangements

This firm does hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name:	FIS EPROCESS INTELLIGENCE LLC
Business Address:	70 SOUTH ORANGE AVE LIVINGSTON, NJ 07039
Effective Date:	12/23/2003
Description:	PROVIDES STORQM PLUS SOFTWARE AND ACTS AS THIRD PARTY PROVIDER TO STORE ELECTRONIC RECORDS. SUNGARD EPROCESS INTELLIGENCE INC. (NAME CHANGE TO FIS EPROCESS INTELLIGENCE LLC)
Name:	MICRO FOCUS INTERNATIONAL PLC
Business Address:	ONE MARKET PLAZA SPEAR TOWER, 19TH FLOOR SAN FRANCISCO, CA 94105
Effective Date:	09/24/2012
Description:	THIRD PARTY ELECTRONIC STORAGE - HEWLET PACKARD ENTERPRISE (NAME CHANGED TO MICRO FOCUS INTERNATIONAL PLC) - AUTONOMY(NOW HEWLETT PACKARD ENTERPRISE) E-MAIL APPLICATION BECAME THE RECORD AND REPLACED ASSENTOR/CAMM ON 9/24/2012
Name:	BROADRIDGE INVESTOR COMMUNICATIONS SOLUTIONS, INC.
Business Address:	1155 LONG ISLAND AVENUE EDGEWOOD, NY 11717
Effective Date:	06/01/2009
Description:	THIRD PARTY ELECTRONIC STORAGE - PROXY RELATED RECORDS. RECONCILIATION REVEALED SERVICE SINCE 6/2009
Name:	NOVA RECORDS, LLC.
Business Address:	9 EMPIRE BLVD. S. HACKENSACK, NJ 07606
Effective Date:	10/01/2008
Description:	MAINTAINS STORAGE FOR ARCHIVED PAPER RECORDS.
Name:	IRON MOUNTAIN
Business Address:	9265 SKY PARK COURT

Firm Operations



Industry Arrangements (continued)

SUITE 202
SAN DIEGO, CA 92123

Effective Date: 10/01/2008

Description: A. BOOKS AND RECORDS AND ELECTRONIC COMMUNICATIONS.
B. MAINTAINS STORAGE OF PHYSICAL RECORDS.
C. INCLUDED WITH BNP PARIBAS COR. CONTRACT AS PART AS AN SLA.
ACTS AS A THIRD PARTY PROVIDER TO ACCESS AND DOWNLOAD
ELECTRONICALLY STORED RECORDS.

Name: SOURCECORP

Business Address: 4434-112TH STREET
DES MOINES, IA 50322-2085

Effective Date: 05/19/2009

Description: THIRD PARTY ELECTRONIC DOCUMENT STORAGE (CONFIRMS,
STATEMENTS AND TAX DOCUMENTS)

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

INNOCAP INVESTMENT MANAGEMENT INC. is under common control with the firm.

CRD #:	150564
Business Address:	1155 RUE METCALFE 2ND FLOOR MONTREAL, CANADA H3B 5G2
Effective Date:	08/23/2011
Foreign Entity:	Yes
Country:	CANADA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

EXANE LIMITED is under common control with the firm.

Business Address:	20 ST. JAMES'S STREET LONDON, ENGLAND SW1A 1ES
Effective Date:	04/08/2004
Foreign Entity:	Yes
Country:	UK
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

EXANE is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 16, AVENUE MATIGNON
PARIS, FRANCE 75008

Effective Date: 04/08/2004

Foreign Entity: Yes

Country: FRANCE

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PRIME BROKERAGE INTERNATIONAL LTD. is under common control with the firm.

Business Address: ROYAL BANK HOUSE, 3RD FLOOR
P.O.BOX 10632
GEORGETOWN, GRAND CAYMAN, CAYMAN ISLANDS KY1-1006

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: CAYMAN ISLANDS

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS (CANADA) VALEURS MOBILIERES INC. is under common control with the firm.

Business Address: 1981 MCGILL COLLEGE AVENUE
SUITE 300
MONTREAL, QC, CANADA H3A2W8

Effective Date: 03/02/2006

Foreign Entity: Yes

Country: CANADA

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

Firm Operations



Organization Affiliates (continued)

IMPAX ASSET MANAGEMENT GROUP, PLC is under common control with the firm.

Business Address:	31 ST JAMES'S SQUARE NORFOLK HOUSE LONDON, ENGLAND SW1Y 4JR
Effective Date:	01/07/2008
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS.

BISHOP STREET CAPITAL MANAGEMENT is under common control with the firm.

Business Address:	FIRST HAWAIIAN CENTER 999 BISHOP STREET, SUITE 2806 HONOLULU, HI 96813
Effective Date:	10/01/2008
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS.

BNP PARIBAS EQUITIES SA is under common control with the firm.

Business Address:	16, BOULEVARD DES ITALIENS PARIS, FRANCE
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

FISCHER FRANCIS TREES & WATTS, INC. is under common control with the firm.

Business Address: 200 PARK AVENUE
NEW YORK, NY 10166

Effective Date: 10/01/2008

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

FISCHER FRANCIS TREES & WATTS SINGAPORE PTE LTD. is under common control with the firm.

Business Address: 50 RAFFLES PLACE #22-01
SINGAPORE LAND TOWER
SINGAPORE, SINGAPORE 048623

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

FISCHER FRANCIS TREES & WATTS KABUSHIKI KAISHA is under common control with the firm.

Business Address: FUKOKU SEIMEI BUILDING 21 F,
2-2, UCHISAIWAICHO 2 CHOME
TOKYO, JAPAN 100

Effective Date: 10/01/2008

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country:	JAPAN
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

FISCHER FRANCIS TREES & WATTS is under common control with the firm.

Business Address:	2 ROYAL EXCHANGE LONDON, UK EC3V 3RA
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	UK
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

UNION DE GESTION FINANCIERE is under common control with the firm.

Business Address:	3 RUE JENNER PLACE D'AFRIQUE TUNIS BELVEDERE, TUNISIA 1002
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	TUNISIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

UNION BANCAIRE POUR LE COMMERCE ET L'INDUS is under common control with the firm.

Business Address:	139 AE DE LA LIBERTE TUNIS, TUNISIA 1002
Effective Date:	10/01/2008

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	TUNISIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

PT BNP PARIBAS PEREGRINE is under common control with the firm.

Business Address:	PLAZA BAPINDO-BANK MANDIRI TOWER, 16TH FLOOR JL. JENDRAL SUDIRMAN KAV. 54-55 JAKARTA, INDOESIA
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	INDONESIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

PT BANK BNP PARIBAS INDONESIA is under common control with the firm.

Business Address:	MENARA BATAVIA, 20TH FLOOR JL K H MAS MANSYUR KAV 126 JAKARTA, INDONESIA 10220
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	INDONESIA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

EUROPHENIX MANAGEMENT COMPANY SA is under common control with the firm.

Business Address:	5 RUE JEAN TONNET
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Firm Operations



Organization Affiliates (continued)

L-2952 LUXEMBOURG
GRAND DUCH OF LUXEMBOURG, LUXEMBOURG

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: LUXEMBOURG

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

CHANGJIANG BNPP PEREGRINE SECURITIES is under common control with the firm.

Business Address: ROOM 4901 JINMAO TOWER
PUDONG
SHANGHAI, CHINA 200121

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: CHINA

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS REUNION is under common control with the firm.

Business Address: 67 JULIETTE DODU
SAINT DENIS, FRANCE 97400

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: FRANCE

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

Firm Operations



Organization Affiliates (continued)

BNP PARIBAS PRIVATE BANK SWITZERLAND is under common control with the firm.

Business Address:	2 PLACE DE HOLLANDE GENEVA, SWITZERLAND CH-1204
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	SWITZERLAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PRIVATE BANK is under common control with the firm.

Business Address:	10 BOULEVARD MALESHERBES PARIS, FRANCE 75008
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PEREGRINE SECURITIES PTE LTD is under common control with the firm.

Business Address:	80 RAFFLE PLACE 43-00 UOB PLAZA I SINGAPORE, SINGAPORE 048624
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	SINGAPORE
Securities Activities:	Yes
Investment Advisory Activities:	No

Firm Operations



Organization Affiliates (continued)

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PEREGRINE SECURITIES KOREA CO. is under common control with the firm.

Business Address: 7/F ORIENTAL CHEMICAL BUILDING, 50
SO-KONG-DONG, CHOONG-KU
SEOUL, KOREA 100D18

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: KOREA

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PEREGRINE SECURITIES INC. is under common control with the firm.

Business Address: 30/F PHILAM LIFE TOWER
MAKATA CITY, PHILLIPINES

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: PHILLIPINES

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS CAPITAL (MALAYSIA) SDN BHD is under common control with the firm.

Business Address: VISTA TOWER, LEVEL 48C
THE INTERMARK, 348 JALAN TUN RAZAK
KUALA LUMPUR, MALAYSIA 50400

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: MALAYSIA

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PEREGRINE FUTURES LIMITED is under common control with the firm.

Business Address: 36/F ASIA PACIFIC TOWER
CITIBANK P3 GARDEN ROAD
HONG KONG, HONG KONG

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS HUNGARIA BANK RT is under common control with the firm.

Business Address: H-1055 BUDAPEST,
HONVED U.20
REPUBLIC OF HUNGARY, HUNGARY

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: HUNGARY

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS FUTURES (HONG-KONG) LIMITED is under common control with the firm.

Business Address: 35/F, ASIA PACIFIC FINANCE TOWER
CENTRAL, HONG KONG

Effective Date: 10/01/2008

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS EQUITY STRATEGIES is under common control with the firm.

Business Address: 3 RUE D'ANTIN
PARIS CEDEX 02, FRANCE 75078

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: FRANCE

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS BANK POLSKA SA is under common control with the firm.

Business Address: UL ZIELNA 41/43
WARSZAWA (WARSAW), POLSKA (POLAND) 00-108

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: POLAND

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS BANK NV is under common control with the firm.

Business Address: HERENGRACHT 477
AMSTERDAM, THE NETHERLANDS 1017 BS

Effective Date: 10/01/2008

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country:	THE NETHERLANDS
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS ARBITRAGE ISSUANCE B.V. is under common control with the firm.

Business Address:	HERENGRACHT 477 AMSTERDAM, THE NETHERLANDS 1017 BS
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	THE NETHERLANDS
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS is under common control with the firm.

Business Address:	3 RUE D'ANTIN PARIS CEDEX 02, FRANCE 75078
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	DIRECTLY OWNS APPLICANT

BNP PAM EUROPE is under common control with the firm.

Business Address:	41 AVENUE DE L'OPERA PAIRS, FRANCE 75002
Effective Date:	10/01/2008

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BERLINER FREIVERKEHR (AKTIEN) AG is under common control with the firm.

Business Address:	KURFIRSTENDAMM RR9 BERLIN, GERMANY D-RO7RR
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	GERMANY
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANCO CNP PARIBAS BRASIL S/A is under common control with the firm.

Business Address:	AV. JUSCELINO KUBITSCHEK, 510 SAO PAULO, S.P., BRAZIL 04534-000
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	BRAZIL
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANCWEST INVESTMENT SERVICES, INC. is under common control with the firm.

Business Address:	13505 CALIFONIA STREET OMAHA, NE 68154
Effective Date:	10/01/2008

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

EXANE, INC. is under common control with the firm.

CRD #:	41784
Business Address:	527 MADISON AVENUE 26TH FLOOR NEW YORK, NY 10022
Effective Date:	10/01/2008
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

CORTAL BANK is under common control with the firm.

Business Address:	5, AVENUE KLEBER PARIS, FRANCE 75116
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS EQUITIES ITALIA SIM S.P.A. is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: PIZZA SAN FEDELE 2
MILAN, ITALY 20121

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: ITALY

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS SECURITIES (ASIA) LTD is under common control with the firm.

Business Address: 59-63/F II INTERNATIONAL FINANCE CENTRE
8 FINANCE STREET
CENTRAL, HONG-KONG, HONG KONG

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS INVESTMENTS (PHILIPPINES) INC. is under common control with the firm.

Business Address: 30TH FLOOR, PHILAMLIFE TOWER - 8767 PASEO DE FUXAS
P.O. BOX 2265 MCPO - 1262 MAKATI CITY
MAKATI CITY, PHILIPPINES

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: PHILIPPINES

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

Firm Operations



Organization Affiliates (continued)

BNP PARIBAS SUISSE S.A. is under common control with the firm.

Business Address:	PLACE DE HOLLANDE 2 - CASE POSTALE 1211 GENEVA 11 GENEVA, SWITZERLAND
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	SWITZERLAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANQUE DE COMMERCE DE LA COTE D IVOIRE is under common control with the firm.

Business Address:	AVENUE FRANCHET D'ESPEREY 01 BP 1298 ABIDJAN 01 ABIDJAN, IVEROY COAST
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	IVOREY COAST
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANQUE MAROCAINE POUR LE COMMERCE ET L'INDUSTRIE is under common control with the firm.

Business Address:	26, PLACE DES NATIONS-UNIES CASABLANCA, MOROCCO
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	MOROCCO
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANQUE POUR LE COMMERCE ET L'INDUSTRIE-MER ROUGE is under common control with the firm.

Business Address:	BP 2122 DJIBOUTI DJIBOUTI, EAST AFRICA
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	EAST AFRICA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANQUE POUR L'INDUSTRIE ET LE COMMERCE-COMORES is under common control with the firm.

Business Address:	PLACE DE FRANCE - BP 175 ET 1009 MORONI/FEDERAL ISLAMIC REPUBLIC OF CORNORO ISLAND FEDERAL ISLAMIC REPUBLIC, CORNORO ISLAND
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	CORNORO ISLAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANQUE MALGACHE DE L'OCEAN INDIEN is under common control with the firm.

Business Address:	IMMEUBLE VOGUE PLACE DE L'INDEPENDANCE BP 25 BIS ANTANANARIVO 101, MADAGASCAR
Effective Date:	10/01/2008
Foreign Entity:	Yes

Firm Operations



Organization Affiliates (continued)

Country:	MADAGASCAR
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP INTERCONTINENTALE is under common control with the firm.

Business Address:	20, BOULEVARD DES ITALIENS PARIS, FRANCE 75009
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BANQUE DE BRETAGNE is under common control with the firm.

Business Address:	18, QUAI DUGUAY - TROUIN 350084 RENNES CEDEX CEDEX, FRANCE
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS MARTINIQUE is under common control with the firm.

Business Address:	1 BOULEVARD HAUSSMANN PARIS, FRANCE 75009
Effective Date:	10/01/2008

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	GUYANA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS GUADELOUPE is under common control with the firm.

Business Address:	1 BOULEVARD HAUSSMANN PARIS, FRANCE 75009
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	GUYANA
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS GUYANE is under common control with the firm.

Business Address:	2, PLACE VICTOR SCHOELCHER 9 7300 CAYENNE FRENCH GUIANA, FRANCE
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS NOUVELLE CALADONIE is under common control with the firm.

Business Address:	20 BOULEVARD DES ITALIENS PARIS, FRANCE 75009
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Firm Operations



Organization Affiliates (continued)

Effective Date: 10/01/2008
Foreign Entity: Yes
Country: NOUVELLE CALEDONIE
Securities Activities: Yes
Investment Advisory Activities: No
Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

B*CAPITAL is under common control with the firm.

Business Address: 32, AVENUE DE L'OPERA
PARIS, FRANCE
Effective Date: 10/01/2008
Foreign Entity: Yes
Country: FRANCE
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PRIVATE BANK PLC is under common control with the firm.

Business Address: 20-21 ST. JAMES STREET
LONDON, UK SW IA IES
Effective Date: 10/01/2008
Foreign Entity: Yes
Country: UNITED KINGDOM
Securities Activities: Yes
Investment Advisory Activities: No
Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS PRIVATE BANK AND TRUST COMPANY (NASSAU) is under common control with the firm.

Business Address: BEAUMONT HOUSE, 3RD FL. - BAY ST. P.O. BOX N-4883
NASSAU, BAHAMAS

Firm Operations



Organization Affiliates (continued)

Effective Date: 10/01/2008
Foreign Entity: Yes
Country: BAHAMAS
Securities Activities: Yes
Investment Advisory Activities: No
Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS (LIECHTENSTEIN) AG is under common control with the firm.

Business Address: AUSTRASSE 27 - FL3490 VADUX - PRINCIPALITY OF LIEC
 VADUX, LIECHTENSTEIN
Effective Date: 10/01/2008
Foreign Entity: Yes
Country: LIECHTENSTEIN
Securities Activities: Yes
Investment Advisory Activities: No
Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS GUERNSEY LTD. is under common control with the firm.

Business Address: LA PLAIDERIE HOUSE/LA PLAIDERIE ST. PETER PORT
 GUERNSEY, CHANNEL ISLANDS
Effective Date: 10/01/2008
Foreign Entity: Yes
Country: CHANNEL ISLANDS
Securities Activities: Yes
Investment Advisory Activities: No
Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

UEB TRUST NASSAU is under common control with the firm.

Business Address: APSLEY HOUSE 75 FREDERICK STREET/P.O. BOX N-4915

Firm Operations



Organization Affiliates (continued)

	NASSAU, BAHAMAS
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	BAHAMAS
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

UEB LUXEMBOURG is under common control with the firm.

Business Address:	AVENUE DE LA PORTE-NEUVE 29 BOITE POSTALE 830 LUXEMBOURG, GERMANY
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	GERMANY
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

UEB SWITZERLAND is under common control with the firm.

Business Address:	15-17, QUAI DES BERGUES CASE POSTALE 1211 GENEVA 1 GENEVA, SWITZERLAND
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	SWITZERLAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS SECURITIES SERVICES S.A. is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 66, RUE DE VICTOIRE
PARIS, FRANCE 75009

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: FRANCE

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS ESPANA is under common control with the firm.

Business Address: C/HERMANOS BECQUER, 3
MADRID, SPAIN 28006

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: SPAIN

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

PAI MANAGEMENT is under common control with the firm.

Business Address: 43, AVENUE DE L'OPERA
PARIS, FRANCE 75002

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: FRANCE

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PAM SINGAPORE LTD. is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 80 RAFFLES PLACE, 52ND FLOOR
UOB PLAZA 1
SINGAPORE, SINGAPORE 048624

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PAM MANAGEMENT ASIA LTD is under common control with the firm.

Business Address: 4-18/F, CENTRAL TOWER
28 QUEEN'S ROAD CENTRAL
HONG KONG, HONG KONG

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: HONG KONG

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIVRECT PARENT, BNP PARIBAS

BNP PAM ARGENTINA is under common control with the firm.

Business Address: AV CORRIENTES 311
1002 BUENOS AIRES
BUENOS AIRES, ARGENTINA

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: ARGENTINA

Securities Activities: No

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PAM SGR SPA is under common control with the firm.

Business Address: PIAZZA SAN FEDELE 2
20121 MILAN
MILAN, ITALY

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: ITALY

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PAM BRAZIL is under common control with the firm.

Business Address: AVE, JUSCELINO KUBITSCHEK, 510
SAO PAULO, BRAZIL

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: BRAZIL

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS ARBITRAGE SNC is under common control with the firm.

Business Address: 13, RUE LAFAYETTE
75009 PARIS
PARIS, FRANCE

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: FRANCE

Securities Activities: Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

CORTAL is under common control with the firm.

Business Address:	131, AVENUE CHARLES DE GAULLE PARIS, FRANCE
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

PARIBAS NEDERLANDS, B.V. is under common control with the firm.

Business Address:	1000 AMSTERDAM AMSTERDAM, NETHERLANDS
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	NETHERLANDS
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS ASIA LIMITED (UK) is under common control with the firm.

Business Address:	10 HAREWOOD AVENUE LONDON, UK NW1 6AA
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	NETHERLANDS
Securities Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS SECURITIES (JAPAN) LTD. is under common control with the firm.

Business Address:	GRANTOKYO NORTH TOWER 1-9-1 MARUNAUCHI, CHIYODA-KU TOKYO, JAPAN 100-6740
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	JAPAN
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

PARIBAS (SUISSE) S.A. is under common control with the firm.

Business Address:	2 PLACE DE HOLLANDE GENEVA, SWITZERLAND CH-1204
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	SWITZERLAND
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

PARIBAS ASSET MANAGEMENT JAPAN LTD is under common control with the firm.

Business Address:	YURAKUCHO DENKI BUILDING, 14TH FLOOR NORTH 1-7-1 YURNKUCHO, CHIYODA-KU TOKYO, JAPAN 100
Effective Date:	10/01/2008
Foreign Entity:	Yes

Firm Operations



Organization Affiliates (continued)

Country:	JAPAN
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

PARIBAS ASSET MANAGEMENT MONACO is under common control with the firm.

Business Address:	6 AVENUE DE LA MADONE MONACO, MONACO 98000
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	MONACO
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS ASSET MANAGEMENT SAS is under common control with the firm.

Business Address:	41, AVENUE DE L'OPERA PARIS, FRANCE 75002
Effective Date:	10/01/2008
Foreign Entity:	Yes
Country:	FRANCE
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS ASSET MANAGEMENT, INC. (USA) is under common control with the firm.

Business Address:	200 PARK AVENUE NEW YORK, NY 10166
Effective Date:	10/01/2008
Foreign Entity:	No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS (UK) LTD. is under common control with the firm.

Business Address: 10 HAREWOOD AVENUE
LONDON, ENGLAND NW1 6AA

Effective Date: 10/01/2008

Foreign Entity: Yes

Country: ENGLAND

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS SECURITIES CORP. is under common control with the firm.

CRD #: 15794

Business Address: 787 7TH AVENUE
NEW YORK, NY 10006

Effective Date: 10/01/2008

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: INDIRECTLY OWNED BY APPLICANTS INDIRECT PARENT, BNP PARIBAS

This firm is directly or indirectly, controlled by the following:

- bank holding company
- national bank

Firm Operations



Organization Affiliates (continued)

- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank

FORTIS BANK SA/NV is a Foreign Bank and controls the firm.

Business Address:	3 MONTAGNE DU PARC B-1000 BRUSSELS, BELGIUM
Effective Date:	05/12/2009
Description:	INDIRECTLY OWNED BY APPLICANT'S INDIRECT PARENT, BNP PARIBAS

BNP PARIBAS is a Bank Holding Company and controls the firm.

Business Address:	3 RUE D'ANTIN PARIS, FRANCE 75002
Effective Date:	10/01/2008
Description:	PARENT



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	18	0
Bond	N/A	1	N/A

Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 18

Reporting Source: Firm

Current Status: Final



Allegations: BNP PARIBAS PRIME BROKERAGE, INC. FAILED TO MAINTAIN AN ELECTRONIC AUDIT TRAIL CONTAINING ALL THE REQUIRED DATA ELEMENTS. PURSUANT TO RULE 512 ("REPORTING INFRACTIONS"), BNP PARIBAS PRIME BROKERAGE, INC. WAS ISSUED A \$5,000 FINE FOR ITS VIOLATION OF RULE 536.B.2.

Initiated By: NYMEX

Date Initiated: 06/30/2014

Docket/Case Number: NYMEX 13-7820

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Other

Resolution Date: 06/30/2014

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: FINED \$5000. DATE PAID 6/30/2014.

Disclosure 2 of 18

Reporting Source: Firm

Current Status: Final

Allegations: EXCHANGE RULE 27.12A - AUDIT TRAIL REQUIREMENTS FOR ELECTRONIC ORDERS. FAILING TO PROVIDE UNIQUE AUTHORIZED TRADER IDS CORRESPONDING TO 14 ORDERS THAT WERE ENTERED ONTO THE ETS IN JULY 2012.

Initiated By: ICE

Date Initiated: 10/16/2013

Docket/Case Number: 2012-056A

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

**Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Other**Resolution Date:** 10/16/2013**Sanctions Ordered:** Monetary/Fine \$5,000.00**Other Sanctions Ordered:****Sanction Details:** FINED \$5000. DATE PAID 10/16/2013.**Disclosure 3 of 18****Reporting Source:** Regulator**Current Status:** Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO REPORT ITS SHORT INTEREST IN 1,934 POSITIONS TOTALING 330,300,866 SHARES AND SUBMITTED AN INACCURATE SHORT INTEREST POSITION REPORT FOR FINRA. THE FINDING STATED THAT THE FIRM'S SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RESPECT TO THE APPLICABLE SECURITIES LAWS AND REGULATIONS, AND FINRA RULES, CONCERNING SHORT INTEREST REPORTING.

Initiated By: FINRA**Date Initiated:** 11/19/2014**Docket/Case Number:** [2012031869801](#)**Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:****Other Sanction(s)/Relief Sought:****Resolution:** Acceptance, Waiver & Consent(AWC)**Resolution Date:** 11/19/2014



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$105,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM WAS CENSURED AND FIND \$105,000. FINE PAID IN FULL ON DECEMBER 5, 2014.
<hr/>	
Reporting Source:	Firm
Current Status:	Final
Allegations:	<p>DURING THE REVIEW PERIOD (SETTLEMENT DATES OCTOBER 15, 2008 THROUGH JANUARY 13, 2012) PBI FAILED TO REPORT ITS SHORT INTEREST IN 1,934 POSITIONS TOTALING 330,300,866 SHARES. IN ADDITION, DURING THE REVIEW PERIOD, PBI SUBMITTED TO FINRA ITS SHORT INTEREST POSITION WHICH INCLUDED 79 SHORT INTEREST POSITIONS TOTALING 22,623,264 SHARES WHEN THE ACTUAL SHORT INTEREST WAS 79 POSITIONS TOTALING 26, 862,852 SHARES. BOTH OF THESE ISSUES CONSTITUTE VIOLATIONS OF NASD RULE 3360 (CONDUCT PRIOR TO DEC 15, 2008) AND FINRA RULE 4560.</p> <p>IN ADDITION, THE FIRM'S SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RESPECT TO THE APPLICABLE SECURITIES LAWS AND REGULATIONS, AND THE RULES OF FINRA, CONCERNING SHORT INTEREST REPORTING. THIS CONDUCT CONSTITUTES A VIOLATION OF FINRA RULE 2010 AND NASD RULE 3010.</p>
Initiated By:	FINRA
Date Initiated:	10/07/2014
Docket/Case Number:	20120318698
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure


Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 11/19/2014

Sanctions Ordered: Censure
Monetary/Fine \$105,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, FIRM WAS CENSURED AND FINED \$105,000.

Disclosure 4 of 18

Reporting Source: Regulator

Current Status: Final

Allegations: BNP PARIBAS PRIME BROKERAGE, INC. ("BNP"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED \$10,000 FOR THE FOLLOWING CONDUCT. BNP FAILED TO PROVIDE ACCURATE INFORMATION TO THE OPTIONS CLEARING CORPORATION (OCC) REGARDING ITS AGGREGATE OPTION POSITION AND FAILED TO REPORT ITS OCEND TO THE OCC DELTA BASED POSITION LIMIT AGGREGATOR REPORT FOR VXX. (EXCHANGE RULES 4.11 - POSITION LIMITS AND 4.22 - COMMUNICATIONS TO THE EXCHANGE OR THE CLEARING CORPORATION)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 02/26/2014

Docket/Case Number: 14-0010

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 04/29/2014

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00

**Other Sanctions Ordered:**

Sanction Details: A \$10,000 FINE AND A CENSURE.

Reporting Source: Firm

Current Status: Final

Allegations: IT IS ALLEGED THAT BNP FAILED TO PROVIDE ACCURATE INFORMATION TO THE OCC REGARDING ITS AGGREGATE OPTION POSITION AND FAILED TO REPORT ITS OCEND (OPTION CONTRACT EQUIVALENT OF THE NET DELTA) TO THE OCC DELTA BASED POSITION LIMIT AGGREGATOR REPORT FOR VXX. (VIOLATION OF EXCHANGE RULES 4.11 AND 4.22)

Initiated By: CHICAGO BOARD OF OPTIONS EXCHANGE

Date Initiated: 02/26/2014

Docket/Case Number: 14-0010

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 04/29/2014

Sanctions Ordered: Censure
Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: \$10,000.00 FINE AND CENSURE.

Disclosure 5 of 18

Reporting Source: Regulator

Current Status: Final

Allegations: FINRA RULES 2010, 2360(B)(5), NASD RULES 2110, 3010, 2860(B)(5) - BNP PARIBAS PRIME BROKERAGE, INC. FAILED TO ACCURATELY REPORT



POSITIONS TO THE LARGE OPTIONS POSITION REPORT (LOPR) AND FAILED TO REPORT TWO RELATED ACCOUNTS TO THE LOPR AS ACTING-IN-CONCERT. THE FIRM FAILED TO HAVE SUPERVISORY PROCEDURES IN PLACE REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH NASD RULE 2860(B)(5) AND FINRA RULE 2360(B)(5).

Initiated By: FINRA

Date Initiated: 10/22/2013

Docket/Case Number: [2011028706601](#)

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/22/2013

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Censure
Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$20,000.

FINE PAID IN FULL ON NOVEMBER 22, 2013.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE REVIEW PERIOD OF OCTOBER 1, 2008 THROUGH DECEMBER 31, 2011 VIOLATIONS OF NASD RULE 2860(B)(5) AND FINRA RULE 2360(B)(5) WERE NOTED DUE TO CYNT (BNP PARIBAS PRIME BROKERAGE INC.)



FAILING TO REPORT APPROXIMATELY 1451 POSITIONS CORRECTLY AND MISTAKENLY REPORTED TWO RELATED ACCOUNTS TO THE LOPR AS ACTING-IN-CONCERT. ADDITIONALLY, CYNT FAILED TO HAVE SUPERVISORY PROCEDURES IN PLACE REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH AFOREMENTIONED RULES, WHICH VIOLATED NASD RULES 2110 AND 3010, AND FINRA RULE 2010. THE FIRM ACCEPTS, WITHOUT ADMITTING OR DENYING THE FINDINGS, A CENSURE AND FINE OF \$20,000 (COMPROMISED OF \$12,500 FOR THE LOPR REPORTING VIOLATION AND \$7500 FOR THE SUPERVISION VIOLATION).

Initiated By: FINRA

Date Initiated: 08/19/2013

Docket/Case Number: 20110287066

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/10/2013

Sanctions Ordered: Censure
Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details:

DURING THE REVIEW PERIOD OF OCTOBER 1, 2008 THROUGH DECEMBER 31, 2011 VIOLATIONS OF NASD RULE 2860(B)(5) AND FINRA RULE 2360(B)(5) WERE NOTED DUE TO CYNT (BNP PARIBAS PRIME BROKERAGE INC.) FAILING TO REPORT APPROXIMATELY 1451 POSITIONS CORRECTLY AND MISTAKENLY REPORTED TWO RELATED ACCOUNTS TO THE LOPR AS ACTING-IN-CONCERT. ADDITIONALLY, CYNT FAILED TO HAVE SUPERVISORY PROCEDURES IN PLACE REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH AFOREMENTIONED RULES, WHICH VIOLATED NASD RULES 2110 AND 3010, AND FINRA RULE 2010. THE FIRM ACCEPTS, WITHOUT ADMITTING OR DENYING THE FINDINGS, A CENSURE AND FINE OF \$20,000 (COMPROMISED OF \$12,500 FOR THE LOPR REPORTING VIOLATION AND \$7500 FOR THE SUPERVISION VIOLATION).



Reporting Source: Regulator

Current Status: Final

Allegations: FINRA RULES 2010 AND 4530(F), NASD RULE 3070(F): THE FIRM FAILED TO PROMPTLY FILE WITH FINRA THE COMPLAINT FOR FIVE (100 PERCENT) SECURITIES-RELATED CIVIL LITIGATION MATTERS OF WHICH IT HAD NOTICE.

Initiated By: FINRA

Date Initiated: 03/27/2013

Docket/Case Number: [2011025773301](#)

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 03/27/2013

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Censure
Monetary/Fine \$15,000.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE FINDINGS THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED \$15,000.

FINE PAID IN FULL ON APRIL 22, 2013

Reporting Source: Firm

Current Status: Final



Allegations:	BETWEEN MAY 2009 AND NOVEMBER 2011, BNP PARIBAS PRIME BROKERAGE INC ("BNPPBI") VIOLATED NASD RULE 3070(F) AND FINRA RULES 4530(F) AND 2010 WHEN IT FAILED TO PROMPTLY FILE WITH FINRA THE COMPLAINT FOR FIVE OUT OF FIVE (100%) SECURITIES-RELATED CIVIL LITIGATION MATTERS OF WHICH IT HAD NOTICE.
Initiated By:	FINRA
Date Initiated:	03/27/2013
Docket/Case Number:	20110257733-01
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	03/27/2013
Sanctions Ordered:	Censure Monetary/Fine \$15,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$15,000.FINE PAID IN FULL ON APRIL 22, 2013
Firm Statement	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, THE FIRM IS CENSURED AND FINED \$15,000. FINE PAID IN FULL ON APRIL 22, 2013

Disclosure 7 of 18

Reporting Source:	Firm
Current Status:	Final
Allegations:	ON MARCH 9, 2012, WITHOUT ADMITTING OR DENYING ALLEGATIONS, BNP PRIME BROKERAGE INC, SUBMITTED AN OFFER OF SETTLEMENT TO THE NYMEX BUSINESS CONDUCT COMMITTEE BNPP ALEGATIONS OF VIOLATING NYMEX RULE 854 (CONCURRENT LONG AND SHORT



POSITIONS). RULE 716 (DUTIES OF CLEARING MEMBERS), AND RULE 770 (DELIVERY OFFSET PROCEDURES). THE FIRM WAS FINED \$210K.

Initiated By:	NYMEX
Date Initiated:	04/16/2012
Docket/Case Number:	NYMEX #10-07447-BC, 11-08456BC & 11-08665
Principal Product Type:	Other
Other Product Type(s):	FUTURES CONTRACT
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	04/16/2012
Sanctions Ordered:	Monetary/Fine \$210,000.00
Other Sanctions Ordered:	
Sanction Details:	ON MARCH 9, 2012, WITHOUT ADMITTING OR DENYING ALLEGATIONS, BNP PRIME BROKERAGE INC, SUBMITTED AN OFFER OF SETTLEMENT TO THE NYMEX BUSINESS CONDUCT COMMITTEE BNPP ALEGATIONS OF VIOLATING NYMEX RULE 854 (CONCURRENT LONG AND SHORT POSITIONS). RULE 716 (DUTIES OF CLEARING MEMBERS), AND RULE 770 (DELIVERY OFFSET PROCEDURES). THE FIRM WAS FINED \$210K.
Firm Statement	ON MARCH 9, 2012, WITHOUT ADMITTING OR DENYING ALLEGATIONS, BNP PRIME BROKERAGE INC, SUBMITTED AN OFFER OF SETTLEMENT TO THE NYMEX BUSINESS CONDUCT COMMITTEE BNPP ALEGATIONS OF VIOLATING NYMEX RULE 854 (CONCURRENT LONG AND SHORT POSITIONS). RULE 716 (DUTIES OF CLEARING MEMBERS), AND RULE 770 (DELIVERY OFFSET PROCEDURES). THE FIRM WAS FINED \$210K.

Disclosure 8 of 18

Reporting Source:	Firm
Current Status:	Final
Allegations:	SIMEX ALLEGED THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY BA FUTURES, INC.) TRADERS WITHHELD ORDERS FROM THE OPEN MARKETS IN VIOLATION OF SIMEX RULES.
Initiated By:	SINGAPORE INTERNATIONAL MONERARY EXCHANGE (SIMEX)



Date Initiated: 11/01/1996
Docket/Case Number: N/A
Principal Product Type: Futures - Commodity
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Other
Other Sanction(s)/Relief Sought: PENALTY/FINE
Resolution: Other
Resolution Date: 04/24/1997
Sanctions Ordered: Monetary/Fine \$5,000.00
Other Sanctions Ordered:
Sanction Details: PENALTY/FINE: \$5,000-DATE PAID: 5/2/97. \$1,000 PAID BY BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY BA FUTURES, INC.;;) \$2,000 EACH PAID BY PETER CHIN AND DANIEL HASIH.

Disclosure 9 of 18

Reporting Source: Firm
Current Status: Final
Allegations: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) IN ITS CAPACITY OF A CLEARING FIRM FAILED TO ACCURETELY AND COMPLETELY RECORD THE TIMES OF WHICH TRADES TO BE CLEARED BY IT OCCURRED IN THE MANNER PRESCRIBED BY THE CBOT. A \$500.00 WAS ASSESSED.
Initiated By: THE BUSINESS CONDUCT COMMITTEE OF THE CHICAGO BOARD OF TRADE.
Date Initiated: 08/11/1989
Docket/Case Number: N/A
Principal Product Type: Futures - Commodity
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 08/11/1998

Sanctions Ordered: Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) IN ITS CAPACITY OF A CLEARING FIRM FAILED TO ACCURETELY AND COMPLETELY RECORD THE TIMES OF WHICH TRADES TO BE CLEARED BY IT OCCURRED IN THE MANNER PRESCRIBED BY THE CBOT. A \$500.00 WAS ASSESSED.

Disclosure 10 of 18

Reporting Source: Firm

Current Status: Final

Allegations: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SECURITIES, INC.) HAD VIOLATED EXCHANGE RULES 4.2 AND 13.1 AND SECTION 15 (C) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 15C3-1. THESE VIOLATIONS RELATED TO THE UNDERCAPITALIZATION OF BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.)

Initiated By: THE BUSINESS CONDUCT COMMITTEE OF THE CHICAGO BOARD OF TRADE

Date Initiated: 07/25/1989

Docket/Case Number: N/A

Principal Product Type: Futures - Commodity

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 07/25/1989



Sanctions Ordered: Monetary/Fine \$2,000.00

Other Sanctions Ordered:

Sanction Details: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SECURITIES, INC). HAD VIOLATED EXCHANGE RULES 4.2 AND 13.1 AND SECTION 15 (C) OF THE SECURITIES EXCHANGE ACT OF 1934 AND RULE 15C3-1. THESE VIOLATIONS RELATED TO THE UNDERCAPITALIZATION OF BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.)

Disclosure 11 of 18

Reporting Source: Firm

Current Status: Final

Allegations: BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) WAS IN VIOLATION RELETING TO MARGINING OF OUT OF THE MONEY SHORT POSITIONS.

Initiated By: THE CHICAGO MERCANTILE EXCHANGE

Date Initiated: 01/31/1988

Docket/Case Number: N/A

Principal Product Type: Futures - Commodity

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 01/31/1998

Sanctions Ordered: Monetary/Fine \$3,000.00

Other Sanctions Ordered:

Sanction Details: BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) WAS IN VIOLATION RELETING TO MARGINING OF OUT OF THE MONEY SHORT POSITIONS.

Disclosure 12 of 18



Reporting Source: Firm

Current Status: Final

Allegations: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT OPTIONS, LTD.) WHICH WAS FORMERLY CRT OPTIONS) VIOLATED CBOE RULE 8.1. THE COMMITTEE FOUND THAT MINOR TECHNICAL VIOLATIONS OF REQUIREMENTS IMPOSED BY THE CBOE BY CERTAIN MARKET MAKERS AFFILIATED WITH BNP PARIBAS PRIME BROKERAGE (FORMERLY CRT OPITONS).

Initiated By: THE BUSINESS CONDUCT COMMITTEE OF THE CHICAGO BOARD OPTIONS EXCH

Date Initiated: 02/03/1987

Docket/Case Number: N/A

Principal Product Type: Options

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 02/03/1987

Sanctions Ordered: Monetary/Fine \$1,000.00

Other Sanctions Ordered:

Sanction Details: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT OPTIONS, LTD.) WHICH WAS FORMERLY CRT OPTIONS) VIOLATED CBOE RULE 8.1. THE COMMITTEE FOUND THAT MINOR TECHNICAL VIOLATIONS OF REQUIREMENTS IMPOSED BY THE CBOE BY CERTAIN MARKET MAKERS AFFILIATED WITH BNP PARIBAS PRIME BROKERAGE (FORMERLY CRT OPITONS).

Disclosure 13 of 18

Reporting Source: Firm

Current Status: Final

Allegations: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE (FORMERLY CRT SERVICES, INC.) HAD VIOLATED CBOT REGULATIONS 350.09, 465.01, 545.02 AND RULE 504.00. THESE VIOLATIONS WERE DUE TO



THE FAILURE OF BNP PARIBAS PRIME BROKERAGE (FORMERLY CRT SERVICES, INC.) IN ITS CAPACITY AS A CLEARING FIRM TO PROPERLY DOCUMENT AND RECORD A SIGNIFICANT NUMBER OF TRADES AND TO MAINTAIN AND FURNISH ADEQUATE RECORDS.

Initiated By: THE BUSINESS CONDUCT COMMITTEE OF THE CHICAGO BOARD OF TRADE

Date Initiated: 10/07/1985

Docket/Case Number: N/A

Principal Product Type: Futures - Financial

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 10/07/1985

Sanctions Ordered: Monetary/Fine \$60,000.00

Other Sanctions Ordered:

Sanction Details: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE (FORMERLY CRT SERVICES, INC.) HAD VIOLATED CBOT REGULATIONS 350.09, 465.01, 545.02 AND RULE 504.00. THESE VIOLATIONS WERE DUE TO THE FAILURE OF BNP PARIBAS PRIME BROKERAGE (FORMERLY CRT SERVICES, INC.) IN ITS CAPACITY AS A CLEARING FIRM TO PROPERLY DOCUMENT AND RECORD A SIGNIFICANT NUMBER OF TRADES AND TO MAINTAIN AND FURNISH ADEQUATE RECORDS.

Disclosure 14 of 18

Reporting Source: Firm

Current Status: Final

Allegations: THE HEARING SUB COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) HAD VIOLATED CME RULE 985 A(1) RELETING TO FAILURE TO MEET AJUSTED NET-CAPITOL REQUIREMENTS FOR FCM'S RESULTING FROM ERRORS IN THE CALCULATIONS OF MARGIN AND ORDERED IT TO CEASE AND DESIST FROM FURTHER VIOLATIONS.

Initiated By: THE HEARING SUB-COMMITTEE OF THE CHICAGO MERCANTILE



	EXCHANGE
Date Initiated:	11/28/1984
Docket/Case Number:	N/A
Principal Product Type:	Futures - Commodity
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Dismissed
Resolution Date:	11/28/1984
Sanctions Ordered:	Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	THE HEARING SUB COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) HAD VIOLATED CME RULE 985 A(1) RELETING TO FAILURE TO MEET AJUSTED NET-CAPITOL REQUIREMENTS FOR FCM'S RESULTING FROM ERRORS IN THE CALCULATIONS OF MARGIN AND ORDERED IT TO CEASE AND DESIST FROM FURTHER VIOLATIONS.

Disclosure 15 of 18

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) HAD VIOLATED CBOT REGULATIONS 431.06 AND 431.07 AND CAPITAL RULES 201, 203, AND 213. THE VIOLATIONS RESULTED FROM A FAILURE TO MEET ADJUSTED NET CAPITAL REQUIREMENTS FROM FCM'S WHICH AROSE DUE TO ERRORS IN THE CALCULATION OF MARGIN.
Initiated By:	THE BUSINESS CONDUCT COMMITTEE OF THE CHICAGO BOARD OF TRADE
Date Initiated:	11/04/1998
Docket/Case Number:	N/A
Principal Product Type:	Futures - Financial

**Other Product Type(s):**

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 11/04/1998

Sanctions Ordered: Monetary/Fine \$40,000.00

Other Sanctions Ordered:

Sanction Details: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) HAD VIOLATED CBOT REGULATIONS 431.06 AND 431.07 AND CAPITAL RULES 201, 203, AND 213. THE VIOLATIONS RESULTED FROM A FAILURE TO MEET ADJUSTED NET CAPITAL REQUIREMENTS FROM FCM'S WHICH AROSE DUE TO ERRORS IN THE CALCULATION OF MARGIN.

Disclosure 16 of 18

Reporting Source: Firm

Current Status: Final

Allegations: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT OPTIONS, LTD.,) PAUL EVANS, FRANK W. FERNANDES AND CERTAIN OTHER PERSONS VIOLATED CBOE RULE 4.11 AND 24.4 WHICH PROHIBITS MEMBERS FROM VIOLATING ESTABLISHED POSITION LIMITS ON OPTIONS CONTRACTS ON THE SAME SIDE OF THE MARKET.

Initiated By: THE BUSINESS CONDUCT COMMITTEE OF THE CHICAGO BOARD OF TRADE

Date Initiated: 06/14/1984

Docket/Case Number: N/A

Principal Product Type: Commodity Option(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:



Resolution: Settled

Resolution Date: 06/14/1984

Sanctions Ordered: Monetary/Fine \$4,000.00

Other Sanctions Ordered:

Sanction Details: THE COMMITTEE FOUND THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT OPTIONS, LTD.), PAUL EVANS, FRANK W. FERNANDES AND CERTAIN OTHER PERSONS VIOLATED CBOE RULE 4.11 AND 24.4 WHICH PROHIBITS MEMBERS FROM VIOLATING ESTABLISHED POSITION LIMITS ON OPTIONS CONTRACTS ON THE SAME SIDE OF THE MARKET.

Disclosure 17 of 18

Reporting Source: Firm

Current Status: Final

Allegations: ALLEGES THAT BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICE, INC.) VIOLATED CBOT RULE 431.00 AND REGULATIONS 431.05 AND 431.07 AND CAPITAL RULE 213.

Initiated By: BUSINESS CONDUCT COMMITTEE OF THE CBOT

Date Initiated: 05/07/1984

Docket/Case Number: N/A

Principal Product Type: Futures - Commodity

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 05/07/1984

Sanctions Ordered: Monetary/Fine \$5,000.00

Other Sanctions Ordered:

Sanction Details: FINE WAS PAID ON 05/07/84

Disclosure 18 of 18



Reporting Source: Firm

Current Status: Final

Allegations: ALLEGES BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY CRT SERVICES, INC.) VIOLATED CBOT RULE 450.00

Initiated By: BUSINESS CONDUCT COMMITTEE OF THE CBOT

Date Initiated: 10/31/1991

Docket/Case Number: N/A

Principal Product Type: Futures - Financial

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 10/31/1991

Sanctions Ordered: Monetary/Fine \$2,500.00

Other Sanctions Ordered:

Sanction Details: FINED \$2500-THE VIOLATION RESULTED FROM UNDERPAYMENT OF CBOT AND MIDAMERICAN EXCHANGE TRANSACTION FEES RESULTING FROM A CLERICAL ERROR. BNP PARIBAS PRIME BROKERAGE, INC. (FORMERLY, CRT SERVICES, INC.) PAID \$560,034.60 IN PAST DUE FEES, ALONG WITH INTEREST IN THE AMOUNT OF \$43,688.50.



Civil Bond

This type of disclosure event involves a civil bond for the brokerage firm that has been denied, paid, or revoked by a bonding company.

Disclosure 1 of 1

Reporting Source:	Firm
Policy Holder:	PARIBAS
Bonding Company Name:	UNION FREEE INSURANCE COMPANY
Disposition:	Payout
Disposition Date:	12/01/1988
Payout Details:	\$410,000.00 IN DECEMBER 1988
Firm Statement	IN DECEMBER 1988, UNIONE FIRE INSURANCE COMPANY PAID PARIBAS \$410,000.00 FOR A LOSS SUSTAINED AS A DIRECT RESULT OF AN UNAUTHORIZED TRANSACTION EFFECTED BY AN EMPLOYEE OF PARIBAS. THE EMPLOYEE WAS DISMISSED WITH CAUSE.

Disclosure Events for Non-Registered Control Affiliates



All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	12	0
Criminal	1	2	0



Disclosure Event Details

Regulatory - Final

Disclosure 1 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS SA
Current Status:	Final
Allegations:	PURSUANT TO A REVIEW THAT HAD COMMENCED IN JULY 2015, THE AMF FOUND (I) THAT ON THE 31ST DECEMBER 2014, BNP PARIBAS, ACTING AS AN INVESTMENT SERVICES PROVIDER CARRYING ON RECEPTION AND TRANSMISSION OF ORDERS ON BEHALF OF THIRD PARTY, DID NOT REPORT TO THE AMF SOME ORDERS ON A LISTED SECURITY THAT COULD HAVE CONSTITUTED A MARKET ABUSE AND (II) CERTAIN DEFAULTS IN THE REPORTING SYSTEM AND IN THE PROCESSES AS REGARDS REPORTING OF TRANSACTIONS THAT COULD BE DEEMED SUSPICIOUS TRANSACTIONS
Initiated By:	FRENCH AUTORITÉ DES MARCHÉS FINANCIERS ("AMF")
Date Initiated:	02/01/2018
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	02/01/2018
Sanctions Ordered:	Monetary/Fine \$200,000.00
Other Sanctions Ordered:	
Sanction Details:	ON NOVEMBER 27, 2017, BNP PARIBAS ENTERED INTO A SETTLEMENT AGREEMENT ("ACCORD DE COMPOSITION ADMINISTRATIVE") WITH THE AMF PURSUANT TO WHICH BNPP (I) AGREED TO PAY TO THE STATE TREASURY A SUM OF 200,000 EUROS AND (II) GAVE UNDERTAKINGS TO FURTHER IMPROVE THE REPORTING SYSTEMS AND PROCESSES AS REGARDS TRANSACTIONS THAT MAY CONSTITUTE A MARKET ABUSE.



THIS SETTLEMENT AGREEMENT WAS APPROVED BY THE ENFORCEMENT COMMISSION OF THE AMF AND PUBLISHED ON 1ST FEBRUARY, 2018.

Disclosure 2 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS SA
Current Status:	Final
Allegations:	PURSUANT TO A REVIEW THAT HAD COMMENCED IN DECEMBER 2015, THE AMF FOUND CERTAIN DEFAULTS IN THE COMPLIANCE CONTROL SYSTEMS OF THE "FIXED INCOME-DEBT CAPITAL MARKETS" ACTIVITIES CARRIED OUT BY BNP PARIBAS' LONDON BRANCH. SPECIFICALLY, THE AMF FOUND THAT SUCH COMPLIANCE CONTROL SYSTEMS DID NOT ENSURE AN ADEQUATE MANAGEMENT OF INSIDE INFORMATION IN THE CONTEXT OF PLACING ACTIVITIES.
Initiated By:	FRENCH AUTORITÉ DES MARCHÉS FINANCIERS ("AMF")
Date Initiated:	12/05/2017
Docket/Case Number:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	12/05/2017
Sanctions Ordered:	Monetary/Fine \$390,000.00
Other Sanctions Ordered:	
Sanction Details:	ON SEPTEMBER 6, 2017, BNP PARIBAS ENTERED INTO A SETTLEMENT AGREEMENT ("ACCORD DE COMPOSITION ADMINISTRATIVE") WITH THE AMF PURSUANT TO WHICH BNPP (I) AGREED TO PAY TO THE STATE TREASURY A SUM OF 390,000 EUROS AND (II) GAVE UNDERTAKINGS TO



FURTHER IMPROVE THE ABOVE-MENTIONED COMPLIANCE CONTROL SYSTEMS. THIS SETTLEMENT AGREEMENT WAS APPROVED BY THE ENFORCEMENT COMMISSION OF THE AMF AND PUBLISHED ON 5 DECEMBER, 2017.

Disclosure 3 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS S.A.; BNP PARIBAS S.A. NEW YORK BRANCH
Current Status:	Final
Allegations:	BNPP ENGAGED IN MANIPULATIVE CONDUCT AND ATTEMPTED TO MANIPULATE BENCHMARK FOREIGN EXCHANGE ("FX") RATES AROUND THE WORLD, DURING AT LEAST 2007 THROUGH 2013, TO BENEFIT BNPP'S OWN TRADING POSITIONS. IN SOME INSTANCES, BNPP CONSPIRED WITH OTHER BANKS IN ORDER TO COORDINATE TRADING. BNPP ALSO IMPROPERLY SHARED CONFIDENTIAL CUSTOMER INFORMATION AND USED MISLEADING SALES TACTICS TO BENEFIT BNPP'S PROFITS AT THE EXPENSE OF CUSTOMERS.
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	05/24/2017
Docket/Case Number:	N/A
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER
Resolution:	Order
Resolution Date:	05/24/2017
Sanctions Ordered:	Monetary/Fine \$350,000,000.00
Other Sanctions Ordered:	N/A
Sanction Details:	THE DFS ORDER REQUIRED BNPP TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$350 MILLION, WHICH WAS PAID ON JUNE 1, 2017.
Firm Statement	BNPP WAS REQUIRED TO PAY A CIVIL MONETARY PENALTY. THE DFS ORDER ALSO REQUIRES BNPP TO SUBMIT WRITTEN PROPOSALS FOR



APPROVAL BY THE DFS COVERING ITS SENIOR MANAGEMENT OVERSIGHT, INTERNAL CONTROLS AND COMPLIANCE PROGRAM, COMPLIANCE RISK MANAGEMENT PROGRAM, AND INTERNAL AUDIT PROGRAM REGARDING BNPP'S FX TRADING BUSINESS AND RELATED SALES ACTIVITIES. THE DFS ORDER REQUIRES BNPP TO AGREE TO NOT RE-EMPLOY IN THE FUTURE CERTAIN EMPLOYEES WHO WERE INVOLVED IN THE MISCONDUCT AND SUBSEQUENTLY RESIGNED OR WERE TERMINATED.

Disclosure 4 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS S.A.
Current Status:	Final
Allegations:	BNPP LACKED ADEQUATE TRANSPARENCY, RISK MANAGEMENT, AND LEGAL AND COMPLIANCE REVIEW POLICIES AND PROCEDURES TO ENSURE THAT ACTIVITIES CONDUCTED AT OFFICES OUTSIDE OF THE UNITED STATES COMPLIED WITH APPLICABLE OFAC REGULATIONS AND DEVELOPED AND IMPLEMENTED POLICIES AND PROCEDURES FOR PROCESSING CERTAIN U.S. DOLLAR TRANSFERS THROUGH THE NEW YORK BRANCH (THE "BRANCH") AND THROUGH OTHER UNAFFILIATED U.S. FINANCIAL INSTITUTIONS INVOLVING PARTIES SUBJECT TO OFAC REGULATIONS THAT OMITTED OR CONCEALED RELEVANT INFORMATION FROM PAYMENT MESSAGES THAT WAS NECESSARY FOR THE BRANCH AND OTHER U.S. FINANCIAL INSTITUTIONS TO DETERMINE WHETHER THESE TRANSACTIONS WERE CARRIED OUT IN A MANNER CONSISTENT WITH U.S. LAW. THE UNSAFE OR UNSOUND PRACTICES AND VIOLATIONS OF LAW DESCRIBED ABOVE WARRANTED THE ASSESSMENT OF A CIVIL MONEY PENALTY.
Initiated By:	BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
Date Initiated:	06/30/2014
Docket/Case Number:	14-022-B-FB; 14-022-CMP-FB
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	CEASE AND DESIST



Resolution:	Order
Resolution Date:	06/30/2014
Sanctions Ordered:	Monetary/Fine \$508,000,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	THE ORDER REQUIRED BNPP TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$508 MILLION.
Firm Statement	THE ORDER REQUIRED BNPP TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$508 MILLION. THE ORDER FURTHER PROVIDED THAT BNPP MAY NOT, DIRECTLY OR INDIRECTLY, RETAIN AS EITHER AN OFFICER, EMPLOYEE, AGENT, CONSULTANT, CONTRACTOR OF BNPP OR ANY AFFILIATE OF BNPP, OR IN ANY OTHER CAPACITY, ELEVEN IDENTIFIED INDIVIDUALS. THIS RESTRICTION ALSO APPLIES TO ANY CURRENT OR FORMER EMPLOYEE WHO IS EITHER SEPARATED FROM BNPP OR WHOSE EMPLOYMENT IS TERMINATED BY BNPP AS A RESULT OF ANY FUTURE FORMAL DISCIPLINARY ACTION AGAINST CURRENT EMPLOYEES AS A RESULT OF BNPP'S INTERNAL DISCIPLINARY REVIEW IN CONNECTION WITH THE CONDUCT. THE ORDER REQUIRED BNPP TO CONTINUE TO PROVIDE SUBSTANTIAL ASSISTANCE TO THE JUSTICE DEPARTMENT AND THE FEDERAL RESERVE IN CONNECTION WITH THE INVESTIGATION OF BNPP'S U.S. DOLLAR CLEARING BUSINESS, INCLUDING THE INVESTIGATION OF EMPLOYEES.

Disclosure 5 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS S.A.
Current Status:	Final
Allegations:	THERE HAVE BEEN INVESTIGATIONS INTO THE PRACTICES OF BNPP CONCERNING THE TRANSMISSION OF FUNDS THROUGH THE UNITED STATES ON BEHALF OF OR RELATED TO ENTITIES AND INDIVIDUALS SUBJECT TO SANCTIONS REGIMES IMPOSED UNDER THE INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT, 50 U.S.C. §§ 1701-06, AND THE TRADING WITH THE ENEMY ACT, 50 U.S.C. §§ 5 AND 16, AND THEIR IMPLEMENTING REGULATIONS. BNPP CONDUCTED A REVIEW OF ITS U.S. DOLLAR TRANSACTIONS AND HAS UNDERTAKEN AND IS IMPLEMENTING, BOTH INSIDE AND OUTSIDE THE UNITED STATES, ENHANCEMENTS TO ITS OFAC COMPLIANCE SYSTEMS AND CONTROLS DESIGNED TO ADDRESS THE HISTORICAL DEFICIENCIES IN ITS USD PAYMENT PROCESSING.
Initiated By:	FRENCH AUTORITÉ DE CONTRÔLE PRUDENTIEL ET DE RÉOLUTION



Date Initiated: 06/30/2014

Docket/Case Number: 14-022-B-FB

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 06/30/2014

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: N/A

Firm Statement
 ACPR ORDER REQUIRED THAT, WITHIN 90 DAYS OF THE ORDER, BNPP MUST SUBMIT TO THE ACPR AN ACCEPTABLE OFAC COMPLIANCE PROGRAM BY BNPP'S GLOBAL BUSINESS LINES (THE "OFAC COMPLIANCE PROGRAM"). THE OFAC COMPLIANCE PROGRAM MUST PROVIDE FOR THE RELOCATION OF A PART OF GROUP FINANCIAL SECURITY TO THE U.S., WHICH WILL BE RESPONSIBLE FOR BNPP'S OFAC COMPLIANCE PROGRAM. WITHIN 90 DAYS OF THE APPROVAL OF THE OFAC COMPLIANCE PROGRAM, BNPP MUST COMPLETE A GLOBAL OFAC RISK ASSESSMENT WITH PARTICULAR ATTENTION PAID TO TRANSACTIONS INVOLVING ITS AFFILIATES, BRANCHES AND SUBSIDIARIES. BNPP MUST ALSO OPERATE ITS U.S. OFFICES IN CONFORMITY WITH THE U.S. FEDERAL BANKING AGENCIES' INTERAGENCY GUIDANCE ON TRANSPARENCY AND COMPLIANCE IN CROSS-BORDER FUNDS TRANSFERS DATED DECEMBER 18, 2009 (SR 09-09), AND ANY FUTURE REVISIONS OR MODIFICATIONS THERETO.

Disclosure 6 of 12

Reporting Source: Firm

Affiliate: BNP PARIBAS S.A.

Current Status: Final

Allegations: THERE HAVE BEEN INVESTIGATIONS INTO THE PRACTICES OF BNPP CONCERNING THE TRANSMISSION OF FUNDS THROUGH THE UNITED



STATES ON BEHALF OF OR RELATED TO ENTITIES AND INDIVIDUALS SUBJECT TO SANCTIONS REGIMES IMPOSED UNDER THE INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT, 50 U.S.C. §§ 1701-06, AND THE TRADING WITH THE ENEMY ACT, 50 U.S.C. §§ 5 AND 16, AND THEIR IMPLEMENTING REGULATIONS. BNPP CONDUCTED A REVIEW OF ITS U.S. DOLLAR TRANSACTIONS AND HAS UNDERTAKEN AND IS IMPLEMENTING, BOTH INSIDE AND OUTSIDE THE UNITED STATES, ENHANCEMENTS TO ITS OFAC COMPLIANCE SYSTEMS AND CONTROLS DESIGNED TO ADDRESS THE HISTORICAL DEFICIENCIES IN ITS USD PAYMENT PROCESSING.

Initiated By: BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

Date Initiated: 06/30/2014

Docket/Case Number: 14-022-B-FB

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 06/30/2014

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: N/A

Firm Statement THE FEDERAL RESERVE ORDER REQUIRED THAT, WITHIN 90 DAYS OF THE ORDER, BNPP MUST SUBMIT TO THE FEDERAL RESERVE AN ACCEPTABLE OFAC COMPLIANCE PROGRAM BY BNPP'S GLOBAL BUSINESS LINES (THE "OFAC COMPLIANCE PROGRAM"). THE OFAC COMPLIANCE PROGRAM MUST PROVIDE FOR THE RELOCATION OF A PART OF GROUP FINANCIAL SECURITY TO THE U.S., WHICH WILL BE RESPONSIBLE FOR BNPP'S OFAC COMPLIANCE PROGRAM. WITHIN 90 DAYS OF THE APPROVAL OF THE OFAC COMPLIANCE PROGRAM, BNPP MUST COMPLETE A GLOBAL OFAC RISK ASSESSMENT WITH PARTICULAR ATTENTION PAID TO TRANSACTIONS INVOLVING ITS AFFILIATES, BRANCHES AND SUBSIDIARIES. BNPP MUST ALSO OPERATE ITS U.S. OFFICES IN CONFORMITY WITH THE U.S. FEDERAL BANKING AGENCIES' INTERAGENCY GUIDANCE ON TRANSPARENCY AND COMPLIANCE IN CROSS-BORDER FUNDS TRANSFERS DATED DECEMBER 18, 2009 (SR 09-09), AND ANY FUTURE REVISIONS OR MODIFICATIONS THERETO.



Disclosure 7 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS S.A.
Current Status:	Final
Allegations:	BNPP IMPLEMENTED POLICIES AND PROCEDURES FOR PROCESSING U.S. DOLLAR-DENOMINATED TRANSFERS THROUGH THE NEW YORK BRANCH AND UNAFFILIATED U.S. FINANCIAL INSTITUTIONS IN A MANNER THAT WAS DESIGNED TO CONCEAL RELEVANT INFORMATION REGARDING SUDAN, IRAN, AND CUBA THAT WOULD PERMIT THE INSTITUTIONS AND THEIR REGULATORS TO DETERMINE WHETHER THE TRANSACTIONS WERE LAWFUL AND CONSISTENT WITH NEW YORK STATE AND U.S. LAWS AND REGULATIONS. BNPP'S CONDUCT ALLOWED SANCTIONED COUNTRIES AND ENTITIES, INCLUDING SPECIALLY DESIGNATED NATIONALS, TO ACCESS THE U.S. FINANCIAL SYSTEM AND ENGAGE IN BILLIONS OF DOLLARS OF U.S. DOLLAR-BASED FINANCIAL TRANSACTIONS, SIGNIFICANTLY UNDERMINING THE U.S. SANCTIONS AND EMBARGOS.
Initiated By:	NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES
Date Initiated:	06/30/2014
Docket/Case Number:	N/A
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CONSENT ORDER
Resolution:	Order
Resolution Date:	06/30/2014
Sanctions Ordered:	Monetary/Fine \$3,293,400,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	BNPP WAS REQUIRED TO PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$2.2434 BILLION, IN ADDITION TO MAKING A PAYMENT OF REPARATIONS AND RESTITUTION TO DFS AND THE STATE OF NEW YORK OF \$1.05 BILLION, THE LATTER OF WHICH WAS SATISFIED BY BNPP'S



PAYMENT TO THE NEW YORK COUNTY DISTRICT ATTORNEY'S OFFICE.

Firm Statement

BNPP WAS REQUIRED TO PAY A CIVIL MONETARY PENALTY AND TO TAKE STEPS TO IMPLEMENT A ONE-YEAR-LONG SUSPENSION, FROM JANUARY 1, 2015 TO DECEMBER 31, 2015, OF CERTAIN U.S. DOLLAR CLEARING SERVICES THROUGH ITS NEW YORK BRANCH (THE "SUSPENSION"). BNPP WAS ALSO PROHIBITED, FOR A PERIOD OF 24 MONTHS FROM THE DATE OF THE ORDER, FROM U.S. DOLLAR CLEARING AS A CORRESPONDENT BANK FOR UNAFFILIATED THIRD PARTY BANKS IN NEW YORK AND LONDON. BNPP MUST NOT CIRCUMVENT THE SUSPENSION IN ANY WAY. THE DFS ORDER ALSO EXTENDED, FOR AN ADDITIONAL TWO YEARS, THE ENGAGEMENT OF AN INDEPENDENT CONSULTANT ("IC"), WHO WAS INITIALLY INSTALLED AS A RESULT OF AN MEMORANDUM OF UNDERSTANDING ENTERED INTO ON AUGUST 19, 2013 BETWEEN BNPP, THE NEW YORK BRANCH, AND THE DFS. THE IC OVERSEES AND EVALUATED BNPP'S REMEDIATION EFFORTS AND THE SUSPENSION. ADDITIONALLY, THE DFS ORDERED REQUIRES TERMINATION OR SEPARATION OF THIRTEEN EMPLOYEES, WHO MAY NOT BE RETAINED IN THE FUTURE, DIRECTLY OR INDIRECTLY, AS EITHER AN OFFICER, EMPLOYEE, AGENT, CONSULTANT, OR CONTRACTOR, BY BNPP OR ANY AFFILIATE OF BNPP.

Disclosure 8 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS S.A.
Current Status:	Final
Allegations:	BNPP APPEARS TO HAVE ENGAGED IN A SYSTEMATIC PRACTICE THAT CONCEALED, REMOVED, OMITTED, OR OBSCURED REFERENCES TO, OR THE INTEREST OR INVOLVEMENT OF, SANCTIONED PARTIES IN U.S. DOLLAR SOCIETY FOR SWIFT PAYMENT MESSAGES SENT TO U.S. FINANCIAL INSTITUTIONS. THE SPECIFIC PAYMENT PRACTICES THE BANK UTILIZED IN ORDER TO PROCESS CERTAIN SANCTIONS-RELATED PAYMENTS TO OR THROUGH THE UNITED STATES INCLUDED OMITTING REFERENCES TO SANCTIONED PARTIES; REPLACING THE NAMES OF SANCTIONED PARTIES WITH BNPP'S NAME OR A CODE WORD; AND STRUCTURING PAYMENTS IN A MANNER THAT DID NOT IDENTIFY THE INVOLVEMENT OF SANCTIONED PARTIES IN PAYMENTS SENT TO U.S. FINANCIAL INSTITUTIONS.
Initiated By:	UNITED STATES DEPARTMENT OF THE TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL
Date Initiated:	06/30/2014



Docket/Case Number:	COMPL-2013-193659
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	SETTLEMENT AGREEMENT
Resolution:	Settled
Resolution Date:	06/30/2014
Sanctions Ordered:	Monetary/Fine \$963,619,900.00
Other Sanctions Ordered:	
Sanction Details:	BNPP AGREED TO PAY OFAC A SETTLEMENT IN THE AMOUNT OF \$963,619,900, WITH SUCH SETTLEMENT DEEMED SATISFIED BY ITS PAYMENT OF A GREATER OR EQUAL AMOUNT IN SATISFACTION OF PENALTIES ASSESSED BY U.S. FEDERAL, STATE, OR COUNTY OFFICIALS ARISING OUT OF THE SAME PATTERN OF CONDUCT.
Firm Statement	THE SETTLEMENT AGREEMENT BETWEEN OFAC AND BNPP WAS ENTERED INTO ON JUNE 30, 2014. THE CONDUCT THAT VIOLATED U.S. SANCTIONS HAS CEASED, AND BNPP AGREED TO ESTABLISH AND MAINTAIN POLICIES AND PROCEDURES THAT PROHIBIT AND ARE DESIGNED TO MINIMIZE THE RISK OF RECURRENCE OF SIMILAR CONDUCT IN THE FUTURE.

Disclosure 9 of 12

Reporting Source:	Firm
Affiliate:	BNP PARIBAS SECURITIES (JAPAN) LTD.
Current Status:	Final
Allegations:	VIOLATION OF ADMINISTRATIVE ORDERS OF THE FINANCIAL SERVICES AGENCY COMMISSIONER BASED ON ARTICLE 56-2 OF THE FINANCIAL INSTRUMENTS EXCHANGE ACT ("FIEA") AND ARTICLE 52, PARAGRAPH 1 (VI) OF THE FIEA. VIOLATION OF ARTICLE 38 (VI) OF THE FIEA AND ARTICLE 117, PARAGRAPH 1 (XIX) OF THE CABINET OFFICE ORDINANCES CONCERNING FINANCIAL INSTRUMENT BUSINESS.
Initiated By:	FINANCIAL SERVICES AGENCY OF JAPAN
Date Initiated:	10/23/2009

**Docket/Case Number:****Principal Product Type:** Derivative(s)**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Suspension**Other Sanction(s)/Relief Sought:****Resolution:** Other**Resolution Date:** 11/16/2009**Sanctions Ordered:** Suspension**Other Sanctions Ordered:****Sanction Details:** BNP PARIBAS SECURITIES (JAPAN) LTD. WAS SUSPENDED OF THE GLOBAL EQUITY AND COMMODITY DERIVATIVES DEPARTMENT FROM NOVEMBER 2, 2009 TO NOVEMBER 16, 2009.**Firm Statement** THIS SUSPENSION OF THE COMMODITY AND DERIVATIVES UNIT WILL NOT AFFECT THE BUSINESS OF OTHER BNP PARIBAS UNITS IN JAPAN. BNP PARIBAS SECURITIES (JAPAN) LTD. HAS BEEN IMPLEMENTING MEASURES TO ENHANCE GOVERNANCE AND CONTROLS AND FURTHER MEASURES WILL BE TAKEN AND REPORTED TO THE FSA (JAPAN).**Disclosure 10 of 12****Reporting Source:** Firm**Affiliate:** PARIBAS FUTURES, INC.**Current Status:** Final**Allegations:** VIOLATION OF EXCHANGE RULE 6.18(A)(I), FAILURE TO PROPERLY TIME STAMP ORDER TICKETS**Initiated By:** NEW YORK MERCANTILE EXCHANGE**Date Initiated:** 09/01/1992**Docket/Case Number:** 92-80 NEW YORK MERCANTILE EXCHANGE**Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)


Other Sanction(s)/Relief Sought:

Resolution:	Settled
Resolution Date:	01/13/1993
Sanctions Ordered:	Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, PARIBAS FUTURES INC. PAID A FINE IN THE AMOUNT OF \$10,000.00

Disclosure 11 of 12

Reporting Source:	Firm
Affiliate:	PARIBAS FUTURES, INC.
Current Status:	Final
Allegations:	VIOLATION OF EXCHANGE RULE 6.18(A)(I), FAILURE TO PROPERLY TIME STAMP ORDER TICKETS.
Initiated By:	NEW YORK MERCANTILE EXCHANGE
Date Initiated:	09/01/1992
Docket/Case Number:	92-80 NEW YORK MERCANTILE EXCHANGE
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	01/13/1993
Sanctions Ordered:	Monetary/Fine \$10,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, PARIBAS FUTURES INC. PAID A FINE IN THE AMOUNT OF \$10,000.00.



Disclosure 12 of 12

Reporting Source:	Firm
Affiliate:	FLEET FINANCIAL GROUP, INC. (PREDECESSOR TO FLEETBOSTON FINANCIAL CORPORATION-NOW KNOW AS BANK OF AMERICA CORPORATION)
Current Status:	Final
Allegations:	PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A. ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWMUT'S TRANSFER AGENT SERVICING OPERATION.
Initiated By:	OFFICE OF THE COMPTROLLER OF CURRENCY
Date Initiated:	01/01/1983
Docket/Case Number:	N/A
Principal Product Type:	Other
Other Product Type(s):	TRANSFER AGENT SERVICES
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	AGREEMENT WAS TERMINATED
Resolution:	Other
Resolution Date:	06/30/1984
Firm Statement	PRIOR TO ITS AFFILIATION WITH FLEET, SHAWMUT BANK OF BOSTON, N.A. ACCEPTED AN AGREEMENT IN 1983 WITH THE OFFICE OF THE COMPTROLLER OF THE CURRENCY THAT TEMPORARILY AND PARTIALLY RESTRICTED THE EXPANSION OF SHAWMUT'S TRANSFER AGENT SERVICING OPERATION. THE AGREEMENT WAS TERMINATED, REMOVING THIS RESTRICTION IN 1984. FLEET FINANCIAL GROUP MERGED WITH SHAWMUT NATIONAL CORPORATION IN 1995



Criminal - Final Disposition

Disclosure 1 of 2

Reporting Source:	Firm
Affiliate:	BNP PARIBAS S.A.
Current Status:	Final
Status Date:	4/15/2015
Charge Details:	ONE COUNT OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, IN VIOLATION OF NEW YORK PENAL LAW § 175.10, A CLASS E FELONY, AND ONE COUNT OF CONSPIRACY IN THE FIFTH DEGREE, IN VIOLATION OF NEW YORK PENAL LAW § 105.05(1), A CLASS A MISDEMEANOR. BNP PARIBAS S.A. ("BNPP") ENTERED A GUILTY PLEA ON BOTH COUNTS.
Felony:	Yes
Court Details:	SUPREME COURT OF THE CITY OF NEW YORK - COUNTY OF NEW YORK - NEW YORK, NEW YORK - 2014 NY 051231
Charge Date:	06/30/2014
Disposition Details:	ON JUNE 30, 2014, BNPP PLEADED GUILTY TO A TWO COUNT INFORMATION IN THE SUPREME COURT OF THE CITY OF NEW YORK, COUNTY OF NEW YORK (THE "SUPREME COURT"). PURSUANT TO A PLEA AGREEMENT, BNPP FORFEITED A TOTAL OF APPROXIMATELY \$8.9 BILLION, WHICH WAS CREDITED AGAINST PAYMENTS MADE BY BNPP IN CONNECTION WITH A CONCURRENT SETTLEMENT OF A RELATED CRIMINAL ACTION BROUGHT BY THE OFFICE OF THE UNITED STATES ATTORNEY FOR THE SOUTHERN DISTRICT OF NEW YORK AND THE ASSET FORFEITURE AND MONEY LAUNDERING SECTION OF THE CRIMINAL DIVISION OF THE UNITED STATES DEPARTMENT OF JUSTICE, AND RELATED REGULATORY ACTIONS BROUGHT BY THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM, THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES, AND THE UNITED STATES DEPARTMENT OF THE TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL. THE FORFEITURE PAYMENT WAS DUE AND PAYABLE BY JULY 30, 2014. ON APRIL 15, 2015, BNPP WAS SENTENCED BY THE SUPREME COURT TO A THREE-YEAR CONDITIONAL DISCHARGE, IN LINE WITH THE PLEA AGREEMENT, REQUIRING BNPP TO IMPLEMENT COMPLIANCE PROCEDURES AND TRAINING, AMONG OTHER THINGS.
Firm Statement	FROM AT LEAST 2004 THROUGH 2012, BNPP KNOWINGLY AND WILLFULLY MOVED OVER \$8.8 BILLION THROUGH THE U.S. FINANCIAL SYSTEM ON BEHALF OF SUDANESE, IRANIAN, AND CUBAN SANCTIONED ENTITIES, IN VIOLATION OF U.S. ECONOMIC SANCTIONS. BNPP WAIVED INDICTMENT AND AGREED TO BE CHARGED IN A TWO COUNT FELONY SUPERIOR COURT INFORMATION, CHARGING BNPP WITH THE CRIME OF FALSIFYING



BUSINESS RECORDS IN THE FIRST DEGREE AND CONSPIRACY IN THE FIFTH DEGREE. BNPP AGREED TO PLEAD GUILTY TO THESE CRIMES AND ACCEPT RESPONSIBILITY FOR ITS CRIMINAL CONDUCT, TO CONTINUE TO COOPERATE, AND TO ENTER INTO A WRITTEN PLEA AGREEMENT.

Disclosure 2 of 2

Reporting Source:	Firm
Affiliate:	BNP PARIBAS S.A.
Current Status:	Final
Status Date:	5/1/2015
Charge Details:	ONE COUNT OF CONSPIRACY TO VIOLATE THE INTERNATIONAL EMERGENCY ECONOMIC POWERS ACT UNDER TITLE 50, UNITED STATES CODE, SECTIONS 1702 AND 1705 ("IEEPA"), AND THE TRADING WITH THE ENEMY ACT, TITLE 50, UNITED STATES CODE APPENDIX, SECTIONS 3, 5, AND 16 ("TWEA"), AND THE EXECUTIVE ORDERS AND REGULATIONS ISSUED THEREUNDER. BNP PARIBAS S.A. ("BNPP") ENTERED A GUILTY PLEA ON BOTH COUNTS.
Felony:	Yes
Court Details:	UNITED STATES DISTRICT COURT - SOUTHERN DISTRICT OF NEW YORK - NEW YORK, NEW YORK - 14-CR-00460
Charge Date:	07/09/2014
Disposition Details:	ON JULY 9, 2014, BNPP PLEADED GUILTY TO A ONE COUNT INFORMATION IN UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK (THE "DISTRICT COURT"). PURSUANT TO A PLEA AGREEMENT, BNPP FORFEITED A TOTAL OF APPROXIMATELY \$8.9 BILLION, WHICH WAS CREDITED AGAINST PAYMENTS MADE BY BNPP IN CONNECTION WITH A CONCURRENT SETTLEMENT OF A RELATED CRIMINAL ACTION BROUGHT BY THE DISTRICT ATTORNEY OF THE COUNTY OF NEW YORK, AND RELATED REGULATORY ACTIONS BROUGHT BY THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM, THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES, AND THE UNITED STATES DEPARTMENT OF THE TREASURY'S OFFICE OF FOREIGN ASSETS CONTROL. THE FORFEITURE PAYMENT WAS DUE AND PAYABLE BY JULY 30, 2014. ON MAY 1, 2015, THE DISTRICT COURT ENTERED A FINAL JUDGMENT OF CONVICTION AGAINST BNPP, WHILE REQUIRING REMEDIES THAT ARE MATERIALLY THE SAME AS THOSE SET FORTH IN THE PLEA AGREEMENT, INCLUDING A TERM OF PROBATION OF FIVE YEARS AND AN OBLIGATION OF CONTINUED COOPERATION WITH THE U.S. DEPARTMENT OF JUSTICE.

**Firm Statement**

FROM AT LEAST 2004 THROUGH 2012, BNPP KNOWINGLY AND WILLFULLY MOVED OVER \$8.8 BILLION THROUGH THE U.S. FINANCIAL SYSTEM ON BEHALF OF SUDANESE, IRANIAN, AND CUBAN SANCTIONED ENTITIES, IN VIOLATION OF U.S. ECONOMIC SANCTIONS. BNPP WAIVED INDICTMENT AND AGREED TO BE CHARGED IN A TWO-COUNT FELONY SUPERIOR COURT INFORMATION, CHARGING BNPP WITH THE CRIME OF FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE AND CONSPIRACY IN THE FIFTH DEGREE. BNPP AGREED TO PLEAD GUILTY TO THESE CRIMES AND ACCEPT RESPONSIBILITY FOR ITS CRIMINAL CONDUCT, TO CONTINUE TO COOPERATE, AND TO ENTER INTO A WRITTEN PLEA AGREEMENT.



Criminal - Pending Charge

Disclosure 1 of 1

Reporting Source:	Firm
Affiliate:	BNP PARIBAS USA, INC.
Current Status:	Pending
Status Date:	
Charge Details:	ONE COUNT OF CONSPIRACY TO VIOLATE SECTION 1 OF THE SHERMAN ACT UNDER TITLE 15, UNITED STATES CODE, SECTION 1. BNP PARIBAS USA, INC. ("BNPP USA") ENTERED A GUILTY PLEA ON THE COUNT
Felony:	Yes
Court Details:	UNITED STATES DISTRICT COURT - SOUTHERN DISTRICT OF NEW YORK - NEW YORK, NEW YORK - 1:18-CR-00061-JSR
Charge Date:	01/25/2018
Firm Statement	<p>ON JANUARY 25, 2018, BNPP USA ENTERED INTO A SETTLEMENT AGREEMENT (THE "SETTLEMENT AGREEMENT") WITH THE U.S. DEPARTMENT OF JUSTICE (THE "DOJ"). THE SETTLEMENT AGREEMENT INCLUDES AN AGREEMENT TO A GUILTY PLEA TO A ONE-COUNT INFORMATION (THE "INFORMATION") IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK (THE "DISTRICT COURT") AND PAYMENT OF A CRIMINAL FINE OF \$90 MILLION. BNPP USA WILL ALSO BE SUBJECT TO CERTAIN ADDITIONAL OBLIGATIONS THEREUNDER, INCLUDING CONTINUING COOPERATION. BNPP USA EXPECTS THAT THE DISTRICT COURT WILL ENTER A FINAL JUDGMENT OF CONVICTION AGAINST BNPP USA THAT WILL REQUIRE REMEDIES THAT ARE MATERIALLY THE SAME AS THOSE SET FORTH IN THE SETTLEMENT AGREEMENT</p> <p>AS DESCRIBED IN THE SETTLEMENT AGREEMENT, BNPP USA, THROUGH ONE OF ITS TRADERS, PARTICIPATED IN COLLUSIVE AND MANIPULATIVE FOREIGN EXCHANGE ("FX") TRADING CONDUCT RESULTING IN MARKET HARM INCLUDING CONSPIRING WITH OTHER BANKS IN ORDER TO COORDINATE TRADING, ATTEMPT TO MANIPULATE EXCHANGE RATES, OR COORDINATE BID/ASK SPREADS CHARGED. BNPP USA WAIVED INDICTMENT AND AGREED TO BE CHARGED IN A ONE-COUNT CRIMINAL INFORMATION, FILED IN THE DISTRICT COURT, CHARGING BNPP USA WITH PARTICIPATING ENTERING INTO AND ENGAGING IN A COMBINATION AND CONSPIRACY TO SUPPRESS AND ELIMINATE COMPETITION BY FIXING PRICES FOR CENTRAL AND EASTERN EUROPEAN, MIDDLE EASTERN, AND AFRICAN ("CEEMEA") CURRENCIES TRADED IN THE UNITED STATES AND ELSEWHERE, THROUGH ONE OF ITS TRADERS, FROM AT LEAST AS EARLY</p>



AS SEPTEMBER 2011 AND CONTINUING UNTIL AT LEAST JULY 2013, IN VIOLATION OF THE SHERMAN ANTITRUST ACT, 15 U.S.C. § 1. BNPP USA AGREED TO PLEAD GUILTY TO THE INFORMATION, TO ENTER INTO THE WRITTEN SETTLEMENT AGREEMENT, AND TO ACCEPT RESPONSIBILITY FOR ITS CRIMINAL CONDUCT

End of Report



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