

Attach as **Exhibit K**, documents that demonstrate compliance with the recordkeeping requirements set forth in § 39.20 of the Commission's regulations including but not limited to:

- a. Applicant's recordkeeping and record retention policies and procedures;
- b. The different activities related to the entity as a derivatives clearing organization for which it must maintain records;
- c. The manner in which records relating to swaps and swap data are gathered and maintained; and
- d. How Applicant will satisfy the performance standards of § 1.31 as applicable to derivatives clearing organizations, including:
 - (1) What "full" or "complete" will encompass with respect to each type of book or record that will be maintained;
 - (2) The form and manner in which books or records will be compiled and maintained with respect to each type of activity for which such books or records will be kept;
 - (3) Confirmation that books and records will be open to inspection by any representative of the Commission or of the U.S. Department of Justice;
 - (4) How long books and records will be readily available and how they will be made readily available during the first two years; and
 - (5) How long books and records will be maintained (and confirmation that, in any event, they will be maintained as required in § 1.31).

EXHIBIT L — PUBLIC INFORMATION

- Attach as **Exhibit L**, documents that demonstrate compliance with the public information requirements set forth in § 39.21 of the Commission's regulations including but not limited to:
 - a. Applicant's procedures for making its rulebook, a list of all current clearing members, and the information listed in § 39.21(c) readily available to the general public, in a timely manner, by posting such information on Applicant's website in accordance with § 39.21(d);
 - b. Any other information routinely made available to the public by Applicant;
 - c. How Applicant will make information available to clearing members and market participants in order to allow such persons to become familiar with Applicant's procedures before participating in clearing operations; and
 - d. How clearing members will be informed of their specific rights and obligations preceding a default and upon a default, and of the specific rights, options and obligations of Applicant preceding and upon a clearing member's default.

EXHIBIT M — INFORMATION SHARING

- Attach as **Exhibit M**, documents that demonstrate compliance with the information sharing requirements set forth in § 39.22 of the Commission's regulations, including but not limited to:
 - a. The appropriate and applicable information sharing agreements to which Applicant is, or intends to be, a party including any domestic or international information-sharing agreements or arrangements, whether formal or informal, which involve or relate to Applicant's operations, especially as it relates to measuring and addressing counterparty risk;
 - b. A description of the types of information expected to be shared and how that information will be shared;