

ELECTRONIC SUBMISSION OF TRANSACTION DATA

IN RE FOREIGN EXCHANGE BENCHMARK RATES ANTITRUST LITIGATION

I. IMPORTANT INFORMATION – PLEASE READ

You should only submit transaction data using the process below after you have submitted a claim.

Please note that the electronic submission of transaction data is required for all Claimants choosing Option 2 (documented) claim and/or Claimants who are claiming transactions in FX Exchange-Traded Instruments under either an Option 1 (estimated) or Option 2 (documented) claim. The transaction and documentation requirements for such Claimants are outlined below.

II. TRANSACTION DATA

- A. Claimants submitting an Option 2 (documented) claim should submit data records of all FX Instruments entered into directly with a Defendant, including but not limited to, FX spot transactions, FX forwards, FX swaps, over-the-counter (OTC) FX options, or other FX transaction in which the trading or settlement value is related in any way to FX rates.

Defendants are: Bank of America, Barclays, BNP Paribas, BTMU, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JPMorgan, Morgan Stanley, Royal Bank of Canada (RBC), Royal Bank of Scotland (RBS), Société Générale, Standard Chartered, and UBS.

- B. Claimants submitting a claim for FX Exchange-Traded Instruments, whether as part of an Option 1 (estimated) claim or Option 2 (documented) claim, must submit all transaction data evidencing transactions in FX Exchange-Traded Instruments.

FX Exchange-Traded Instrument means any and all FX Instruments that were listed for trading through an exchange, including, but not limited to, FX futures and options on FX futures.

III. REQUIRED FILING FORMAT

- A. General Instructions (required formatting applicable to all files, regardless of transaction type)
- **IMPORTANT:** Separate files must be submitted for each type of transaction (e.g., FX spot, FX forwards, OTC FX options, FX swaps, FX futures, and options on FX futures). Separate files are required because the information needed to process your claim varies by type of instrument.
 - Transaction files must be submitted as comma-separated value (CSV) files and NOT in Microsoft Excel. CSV files can be created in Excel.
 - All fields in the required format defined for the applicable transaction type must be included in your file.

- Any fields that do not apply to your file must be left blank (do not delete any fields).
 - Your file must include one header row with column headings.
 - Do not provide any blank rows on your file.
 - Any files not in accordance with the required format defined for the applicable transaction type are subject to rejection.
 - Do not submit duplicate trades.
 - Certain fields are **MANDATORY**. Any mandatory fields are noted as such in the file layouts, below.
- B. Special instructions for trades on ECNs with anonymous execution: If you traded on Electronic Communication Networks (ECNs) (e.g., Currenex, Hotspot, FXALL, EBS, Reuters) that did not always reveal your counterparty’s identity, submit all of your data on FX Instruments executed on such ECNs, and the Claims Administrator will apply the Plan of Distribution’s “Anonymous ECN Ratio” to your trades.
- C. Special instructions for non-U.S. domiciled Claimants submitting Option 2 claims: If you are domiciled outside of the United States and are submitting an Option 2 claim, you will need to provide either: (i) a field in your transaction data that indicates the location of the defendant bank’s desk that booked your trades; or (ii) in the absence of a bank location field, submit all of your data on FX Instruments traded with Defendants (or on an ECN with anonymous execution), and the Claims Administrator will apply the Plan of Distribution’s “Location Factors” to your trades.
- D. Required file layouts for each of six different transaction types identified below (FX spot, FX forwards, OTC FX options, FX swaps, FX futures, and options on FX futures)

IMPORTANT: Do not combine data for different transaction types in the same file.

1. Required file layout for FX spot:

Column	Field	Description
1	Name	Name of entity trading (claimant name). THIS FIELD IS MANDATORY.
2	Counterparty	Name of the counterparty the claimant traded with (bank name). THIS FIELD IS MANDATORY.
3	Location of Executing Bank	Geographic location of the bank desk that booked the trade (e.g., London, New York, Paris). FOR NON-U.S. DOMICILED CLAIMANTS, PLEASE PROVIDE IF AVAILABLE, OTHERWISE SEE SPECIAL INSTRUCTION C ABOVE. THIS FIELD IS <u>NOT</u> REQUIRED IF YOU ARE DOMICILED IN THE UNITED STATES.
4	Claimant ID	The Claimant ID number on your Claim Form. THIS FIELD IS MANDATORY.

5	Venue	Name of the ECN venue (e.g., Currenex, Hotspot, FXALL, EBS, Reuters) through which the trade was submitted (if applicable, blank otherwise). THIS FIELD IS MANDATORY FOR CLAIMANTS WHO TRADED ON ANONYMOUS ECNS. SEE SPECIAL INSTRUCTION B ABOVE.
6	Prime broker	Name of prime broker (if applicable, blank otherwise).
7	Transaction ID	Transaction ID number assigned by the entity counterparty claimant traded with.
8	FX transaction type	Must be one of: "spot," "forward," "swap," "OTC option," "future," "option on future." THIS FIELD IS MANDATORY.
9	Trade date	Calendar date that the trade was submitted in YYYY-MM-DD format. THIS FIELD IS MANDATORY.
10	Trade timestamp	The timestamp when the trade was agreed to the highest precision available. This must be in the format YYYY-MM-DD HH:MM:SS:MMM. If seconds or milliseconds are unavailable those values should be set to 0. If hours are unavailable they should be set to 12.
11	Time zone	This is the time zone of the Submitted Date/Time values supplied. This should be in IANA (tz) format, for example "UTC," "US/Eastern," or "Asia/Singapore."
12	Trade rate	The price that applied to the trade. THIS FIELD IS MANDATORY.
13	Base currency	ISO 4217 code of the base currency in uppercase. THIS FIELD IS MANDATORY.
14	Quoted currency	ISO 4217 code of the quoted currency in uppercase. THIS FIELD IS MANDATORY.
15	BUY/SELL	BUY if claimant bought the base currency; SELL if claimant sold the base currency. THIS FIELD IS MANDATORY.
16	Base amount	Notional amount of the trade, in the base currency. THIS FIELD IS MANDATORY.
17	Contra amount	The contra amount in the quoted currency (blank otherwise).
18	Value date	The value (settlement) date of the trade, in YYYY-MM-DD format. THIS FIELD IS MANDATORY.

2. Required file layout for FX forwards (note this layout is identical to FX spot):

Column	Field	Description
1	Name	Name of entity trading (claimant name). THIS FIELD IS MANDATORY.
2	Counterparty	Name of the counterparty the claimant traded with (bank name). THIS FIELD IS MANDATORY.

3	Location of Executing Bank	Geographic location of the bank desk that booked the trade (e.g., London, New York, Paris). FOR NON-U.S. DOMICILED CLAIMANTS, PLEASE PROVIDE IF AVAILABLE, OTHERWISE SEE SPECIAL INSTRUCTION C ABOVE. THIS FIELD IS <u>NOT</u> REQUIRED IF YOU ARE DOMICILED IN THE UNITED STATES.
4	Claimant ID	The Claimant ID number on your Claim Form. THIS FIELD IS MANDATORY.
5	Venue	Name of the ECN venue (e.g., Currenex, Hotspot, FXALL, EBS, Reuters) through which the trade was submitted (if applicable, blank otherwise). THIS FIELD IS MANDATORY FOR CLAIMANTS WHO TRADED ON ANONYMOUS ECNS. SEE SPECIAL INSTRUCTION B ABOVE.
6	Prime broker	Name of prime broker (if applicable, blank otherwise).
7	Transaction ID	Transaction ID number assigned by the entity counterparty claimant traded with.
8	FX transaction type	Must be one of: “spot,” “forward,” “swap,” “OTC option,” “future,” “option on future.” THIS FIELD IS MANDATORY.
9	Trade date	Calendar date that the trade was submitted in YYYY-MM-DD format. THIS FIELD IS MANDATORY.
10	Trade timestamp	The timestamp when the trade was agreed to the highest precision available. This must be in the format YYYY-MM-DD HH:MM:SS:MMM. If seconds or milliseconds are unavailable those values should be set to 0. If hours are unavailable they should be set to 12.
11	Time zone	This is the time zone of the Submitted Date/Time values supplied. This should be in IANA (tz) format, for example “UTC,” “US/Eastern,” or “Asia/Singapore.”
12	Trade rate	The price that applied to the trade. THIS FIELD IS MANDATORY.
13	Base currency	ISO 4217 code of the base currency in uppercase. THIS FIELD IS MANDATORY.
14	Quoted currency	ISO 4217 code of the quoted currency in uppercase. THIS FIELD IS MANDATORY.
15	BUY/SELL	BUY if claimant bought the base currency; SELL if claimant sold the base currency. THIS FIELD IS MANDATORY.
16	Base amount	Notional amount of the trade, in the base currency. THIS FIELD IS MANDATORY.
17	Contra amount	The contra amount in the quoted currency (blank otherwise).
18	Value date	The value (settlement) date of the trade, in YYYY-MM-DD format. THIS FIELD IS MANDATORY.

3. Required file layout for OTC FX options:

Column	Field	Description
1	Name	Name of entity trading (claimant name). THIS FIELD IS MANDATORY.
2	Counterparty	Name of the counterparty the claimant traded with (bank name). THIS FIELD IS MANDATORY.
3	Claimant ID	The Claimant ID number on your Claim Form. THIS FIELD IS MANDATORY.
4	Location of Executing Bank	Geographic location of the bank desk that booked the trade (e.g., London, New York, Paris). FOR NON-U.S. DOMICILED CLAIMANTS, PLEASE PROVIDE IF AVAILABLE, OTHERWISE SEE SPECIAL INSTRUCTION C ABOVE. THIS FIELD IS <u>NOT</u> REQUIRED IF YOU ARE DOMICILED IN <u>THE</u> UNITED STATES.
5	Venue	Name of the ECN venue (e.g., Currenex, Hotspot, FXALL, EBS, Reuters) through which the trade was submitted (if applicable, blank otherwise). THIS FIELD IS MANDATORY FOR CLAIMANTS WHO TRADED ON ANONYMOUS ECNS. SEE SPECIAL INSTRUCTION B ABOVE.
6	Prime Broker	Name of prime broker (if applicable, blank otherwise).
7	Transaction ID	Transaction ID number assigned by the entity counterparty claimant traded with.
8	FX transaction type	Must be one of: "spot," "forward," "swap," "OTC option," "future," "option on future." THIS FIELD IS MANDATORY.
9	Put or Call	Either "put" or "call." THIS FIELD IS MANDATORY.
10	Trade date	Calendar date that the trade was submitted in YYYY-MM-DD format. THIS FIELD IS MANDATORY.
11	Trade timestamp	The timestamp when the trade was agreed to the highest precision available. This must be in the format YYYY-MM-DD HH:MM:SS:MMM. If seconds or milliseconds are unavailable those values should be set to 0. If hours are unavailable they should be set to 12.
12	Time zone	This is the time zone of the Submitted Date/Time values supplied. This should be in IANA (tz) format, for example "UTC," "US/Eastern," or "Asia/Singapore."
13	Strike price	The strike price that applied to the trade. THIS FIELD IS MANDATORY.
14	Base currency (also known as the underlying currency)	ISO 4217 code of the base currency in uppercase. THIS FIELD IS MANDATORY.
15	Quote currency	ISO 4217 code of the quoted currency in uppercase. THIS FIELD IS MANDATORY.

16	Base amount	Notional amount of the trade, in the base currency. THIS FIELD IS MANDATORY.
17	Contra amount	The contra amount in the quoted currency (blank otherwise).
18	Value date	The value date of the trade, in YYYY-MM-DD format THIS FIELD IS MANDATORY.
19	BUY/SELL	BUY if claimant bought the option; SELL if claimant sold the option. THIS FIELD IS MANDATORY.
20	Delta	Value of delta of the option in units of base currency at time of transaction (if recorded, blank otherwise).
21	Delta hedged (YES/NO)	YES if the option was traded on a delta-hedged basis; NO if the option was traded on a live basis.
22	Expiry date	Expiry of the option in YYYY-MM-DD format. THIS FIELD IS MANDATORY.
23	Exercised/cash settled (YES/NO)	YES if the option was exercised or cash settled; NO if the option expired unexercised.

4. Required file layout for FX swap transactions:

Column	Field	Description
1	Name	Name of entity trading (claimant name). THIS FIELD IS MANDATORY.
2	Counterparty	Name of the counterparty the claimant traded with (bank name). THIS FIELD IS MANDATORY.
3	Location of Executing Bank	Geographic location of the bank desk that booked the trade (e.g., London, New York, Paris). FOR NON-U.S. DOMICILED CLAIMANTS, PLEASE PROVIDE IF AVAILABLE, OTHERWISE SEE SPECIAL INSTRUCTION C ABOVE. THIS FIELD IS <u>NOT</u> REQUIRED IF YOU ARE DOMICILED IN THE UNITED STATES.
4	Claimant ID	The Claimant ID number on your Claim Form. THIS FIELD IS MANDATORY.
5	Venue	Name of the ECN venue (e.g., Currenex, Hotspot, FXALL, EBS, Reuters) through which the trade was submitted (if applicable, blank otherwise). THIS FIELD IS MANDATORY FOR CLAIMANTS WHO TRADED ON ANONYMOUS ECNS. SEE SPECIAL INSTRUCTION B ABOVE.
6	Prime Broker	Name of prime broker (if applicable, blank otherwise).
7	Transaction ID	Transaction ID number assigned by the entity counterparty claimant traded with.
8	FX transaction type	Must be one of: "spot," "forward," "swap," "OTC option," "future," "option on future." THIS FIELD IS MANDATORY.
9	Trade date	Calendar date that the trade was submitted in YYYY-MM-DD format. THIS FIELD IS MANDATORY.

10	Trade timestamp	The timestamp when the trade was agreed to the highest precision available. This must be in the format YYYY-MM-DD HH:MM:SS:MMM. If seconds or milliseconds are unavailable those values should be set to 0. If hours are unavailable they should be set to 12.
11	Time zone	This is the time zone of the Submitted Date/Time values supplied. This should be in IANA (tz) format, for example "UTC," "US/Eastern," or "Asia/Singapore."
12	Near leg value date	Value date of near leg. THIS FIELD IS MANDATORY.
13	Far leg value date	Value date of far leg. THIS FIELD IS MANDATORY.
14	Near leg trade rate	Trade rate of near leg. THIS FIELD IS MANDATORY.
15	Far leg trade rate	Trade rate of far leg. THIS FIELD IS MANDATORY.
16	Spot rate	The spot rate associated with the swap (blank otherwise).
17	Base currency	ISO 4217 code of the base currency in uppercase. THIS FIELD IS MANDATORY.
18	Quoted currency	ISO 4217 code of the quoted currency in uppercase. THIS FIELD IS MANDATORY.
19	BUY/SELL near leg	BUY if claimant bought the base currency on the near leg; SELL if claimant sold the base currency on the near leg. THIS FIELD IS MANDATORY.
20	Base amount near leg	Notional amount of the near leg trade, in the base currency. THIS FIELD IS MANDATORY.
21	Contra amount near leg	The contra amount of the near leg trade in the quoted currency (blank otherwise).
22	BUY/SELL far leg	BUY if claimant bought the base currency on the far leg; SELL if claimant sold the base currency on the far leg. THIS FIELD IS MANDATORY.
23	Amount far leg	Notional amount of the far leg trade, in the base currency. THIS FIELD IS MANDATORY.
24	Contra amount far leg	The contra amount of the far leg trade in the quoted currency (blank otherwise).

5. Required file layout for FX futures transactions:

Column	Field	Description
1	Name	Name of entity trading (claimant name). THIS FIELD IS MANDATORY.
2	Claimant ID	The Claimant ID number on your Claim Form. THIS FIELD IS MANDATORY.
3	Broker	Name of the broker or Futures Commission Merchant (FCM) through which the trade was submitted. THIS FIELD IS MANDATORY.
4	Exchange name	Name of exchange where trade was executed. THIS FIELD IS MANDATORY.
5	Transaction ID	Transaction ID number assigned by the exchange.

6	FX transaction type	Must be one of: "spot," "forward," "swap," "OTC option," "future," "option on future." THIS FIELD IS MANDATORY.
7	Trade date	Calendar date that the trade was submitted in YYYY-MM-DD format. THIS FIELD IS MANDATORY.
8	Trade timestamp	The timestamp when the trade was agreed to the highest precision available. This must be in the format YYYY-MM-DD HH:MM:SS:MMM. If seconds or milliseconds are unavailable those values should be set to 0. If hours are unavailable they should be set to 12.
9	Time zone	This is the time zone of the Submitted Date/Time values supplied. This should be in IANA (tz) format, for example "UTC," "US/Eastern," or "Asia/Singapore."
10	Exchange product code	Product code as defined by the exchange. THIS FIELD IS MANDATORY.
11	Trade rate	Rate at which the claimant traded. THIS FIELD IS MANDATORY.
12	Number of contracts	Number of contracts involved in this trade. THIS FIELD IS MANDATORY.
13	Base currency	ISO 4217 code of the base currency in uppercase. THIS FIELD IS MANDATORY.
14	Quoted currency	ISO 4217 code of the quoted currency in uppercase. THIS FIELD IS MANDATORY.
15	BUY/SELL	BUY if claimant bought the contract; SELL if claimant sold the contract. THIS FIELD IS MANDATORY.
16	Base amount	Notional total amount of the trade (sum of contracts), in the base currency. THIS FIELD IS MANDATORY.
17	Contra amount	The contra amount of the trade (sum of contracts) in the quoted currency (blank otherwise).
18	Expiry Date	The expiration date of the contract. THIS FIELD IS MANDATORY.

6. Required file layout for options on FX futures:

Column	Field	Description
1	Name	Name of entity trading (claimant name). THIS FIELD IS MANDATORY.
2	Claimant ID	The Claimant ID number on your Claim Form. THIS FIELD IS MANDATORY.
3	Broker	Name of the broker or FCM through which the trade was submitted. THIS FIELD IS MANDATORY.
4	Exchange name	Name of exchange where option trade was executed. THIS FIELD IS MANDATORY.
5	Transaction ID	Transaction ID number assigned by the exchange claimant traded with.

6	FX transaction type	Must be one of: "spot," "forward," "swap," "OTC option," "future," "option on future." THIS FIELD IS MANDATORY.
7	Put or Call	Either "put" or "call." THIS FIELD IS MANDATORY.
8	Trade date	Calendar date that the trade was submitted in YYYY-MM-DD format. THIS FIELD IS MANDATORY.
9	Exchange product code	Product code as defined by the exchange. THIS FIELD IS MANDATORY.
10	Strike price	Rate of the underlying futures contract. THIS FIELD IS MANDATORY.
11	Trade rate	Rate at which the claimant traded. THIS FIELD IS MANDATORY.
12	Number of contracts	Number of contracts involved in this trade. THIS FIELD IS MANDATORY.
13	Base currency	ISO 4217 code of the base currency in uppercase. THIS FIELD IS MANDATORY.
14	Quoted currency	ISO 4217 code of the quoted currency in uppercase. THIS FIELD IS MANDATORY.
15	BUY/SELL (contract)	BUY if the underlying contract is to buy the base currency; SELL if the underlying contract is to sell the base currency. THIS FIELD IS MANDATORY.
16	Base Amount	Notional total amount of the underlying contracts (sum of contracts), expressed in the base currency. THIS FIELD IS MANDATORY.
17	Contra amount	The contra amount in the quoted currency (blank otherwise).
18	Settlement date	Settlement date of the contract. THIS FIELD IS MANDATORY.
19	BUY/SELL (option)	BUY if the option is to buy the underlying contract; SELL if the option is to sell the underlying contract. THIS FIELD IS MANDATORY.
20	Delta	Value of delta in units of base currency of the option at time of transaction (if recorded, blank otherwise).
21	Expiry date	Expiry of the option in YYYY-MM-DD format. THIS FIELD IS MANDATORY.
22	Exercised (YES/NO)	YES if the option was exercised; NO if the option expired unexercised.

IV. TRANSACTION DOCUMENTATION REQUIREMENTS

Claimants electing to submit an Option 2 (documented) claim and/or claiming transactions in FX Exchange-Traded Instruments under either Option 1 (estimated) claim or Option 2 (documented) claim must submit documentation of the transaction data they submit. Documentation should be from one or more of the following sources:

- A. Bank confirmations by individual trade;
- B. Bank transaction reports or statements;

- C. Trading venue transaction reports or statements;
- D. Prime broker reports or statements;
- E. Custodian reports or statements;
- F. Daily or monthly account statements; or
- G. Other documents evidencing transactions in FX Instruments and/or FX Exchange-Traded Instruments.

V. ADDITIONAL DOCUMENTATION REQUIREMENTS

The documentation requirements outlined below must be submitted as part of your claim.

Please note that one single document may meet more than one requirement.

- A. Signature Verification Document: You must provide a document verifying that the individual who signed the claim form and any supplemental documents is authorized to sign on behalf of his/her company. Some common types of documents that fulfill this requirement include the following:

- 1. Copy of company's By-Laws, including signature page(s)
- 2. Copy of company's Corporate Resolution, including signature page(s)
- 3. Notarized Affidavit signed by an officer of the institution clearly granting a specific individual(s) authorization or confirming his/her authority to sign on behalf of his/her company.

- B. Data Verification Document: You must provide a notarized affidavit or signed letter on firm letterhead that meets the below criteria:

- 1. Confirms the number of transactions in your file.
- 2. Discloses the source of your data (e.g., internal data retention system)
- 3. Attests to the truth and accuracy of the transactions in your electronic file.
- 4. Is executed by an authorized signatory who is listed on your signature verification document and specifies both the capacity and contact information of that signatory.

- C. Authorization Document (if filing on behalf of client or customer accounts): You must provide a current document verifying that you are authorized to file and sign claims on behalf of your clients. Some common types of documents that fulfill this requirement include the following:

- 1. Power of attorney
- 2. Service agreement
- 3. Signed/dated letter on client's company letterhead specifically granting your company authority to file/sign claims on their behalf.

4. Notarized affidavit or signed letter on your company's letterhead confirming your authority to file and sign claims on behalf of your clients. It must be executed by an officer of the company and reference the capacity and contact information of the signatory.

Additional Documentation (if requested) – Data Integrity Audit

The Claims Administrator may request random entities, as deemed appropriate by the Claims Administrator, who file claims electronically to provide documentation to support certain transactions. This data integrity audit is designed to verify the overall integrity of a data file. Accordingly, the documentation provided must be independent in nature and sufficient to verify the validity and accuracy of the entire data file.

Even if you provided a letter/affidavit attesting to the truth and accuracy of your data when initially submitting your file electronically, we will **require** specific documentary evidence (statements, confirmations, or the equivalent) to independently verify the details of the transactions and/or holdings requested, if your file is selected for a data integrity audit.

Failure to comply with this audit request will result in the rejection of ALL claims on your electronic submission.

VI. METHODS OF SUBMISSION

Electronic files will not be deemed properly submitted unless the Claims Administrator issues an email after processing your file with your claim numbers and respective account information. Do not assume that your file has been received or processed until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the electronic filing department at eClaim@choossegcg.com to inquire about your file and confirm that it was received and is acceptable.

The following methods are available for submitting your transaction data and required documentation:

A. Online

- You may upload your transaction data and required documentation as part of the online claim filing process at www.FXAntitrustSettlement.com.
- You may log in using the Claim Number and Control Number located on the Claim Form that was mailed to you or, if you did not receive a pre-printed Claim Form, you can complete the claimant information form on the website to obtain log in information.

B. Email

- You may email your transaction data to eClaim@choossegcg.com
- If you choose to email your file, you **MUST** also attach all documentation requirements in the email as .pdf documents or equivalent.

C. Mail

- You may send your electronic claim submission in the mail on a disk or CD along with all other documentation requirements. Please use the following address if mailing via U.S. Mail:

In re Foreign Exchange Benchmark Rates Antitrust Litigation
c/o GCG
P.O. Box 10239
Dublin, OH 43017-5739

If you need to send your submission via Federal Express or UPS, please use the following street address:

In re Foreign Exchange Benchmark Rates Antitrust Litigation c/o GCG
Attn: Electronic Filing Department
5151 Blazer Parkway, Suite A
Dublin, OH 43017