

COMMODITY FUTURES TRADING COMMISSION RULE 1.55(K):
FCM-SPECIFIC DISCLOSURE DOCUMENT

The Commodity Futures Trading Commission (Commission) requires each futures commission merchant (FCM), including Credit Suisse Securities (USA) LLC (CSSU or the Firm), to provide the following information to an FCM customer prior to the time the customer first enters into an account agreement with the FCM or deposits money or securities (funds) with the FCM. Except as otherwise noted below, the information set out is as of October 30, 2021. CSSU will update this information annually and as necessary to take account of any material change to its business operations, financial condition or other factors that CSSU believes may be material to a customer's decision to do business with CSSU. Nonetheless, CSSU's business activities and financial data are not static and will change in non-material ways frequently throughout any 12-month period.

CSSU is an ultimate subsidiary of Credit Suisse Group AG (Credit Suisse), an entity that files annual reports on Form 20-F and periodic reports on Form 6-K (including quarterly financial reports) with the U.S. Securities and Exchange Commission (SEC). In relevant parts of this Disclosure Document, we have included references to sections of Credit Suisse's most recent annual report that contain information that may be material to an FCM customer. We note, however, that information in other sections of Credit Suisse's annual report or periodic reports, which may be material with respect to Credit Suisse for purposes of applicable securities laws, may not be material to an FCM customer, and information contained in this Disclosure Document, which may be material to an FCM customer, may not be material to Credit Suisse for purposes of applicable securities laws.

Firm and its Principals

(1) Listed below is the Firm's name, address of its principal place of business, phone number, fax number and email address.

Credit Suisse Securities (USA) LLC
Eleven Madison Avenue
New York, NY 10010-3629
Phone Number: (212) 325-2000
Fax Number: (212) 325-6665
list.ld-us-marketing@credit-suisse.com

(2) Listed below are the names, titles, business addresses, business backgrounds, areas of responsibility and the nature of the duties of each individual that the Firm has identified as one of its principals, as that term is defined in Commission Regulation 3.1(a).

Name	Title	Business Address	Areas of Responsibility	Nature of Duties and Business Background
John Steel	Director	Eleven Madison Ave., NY, NY 10010	Prime Derivatives Service COO	Chief Operating Officer of Prime Derivatives Services at Credit Suisse. John joined Credit Suisse in 1997 and has over 24 years of experience working at the Firm.
Christian Meissner	Managing Director	Eleven Madison Ave., NY, NY 10010	Chief Executive Officer of Investment Bank	CEO of the Investment Banking division and member of the Executive Board of Credit Suisse. Prior to joining Credit Suisse Christian worked at Bank of America Merrill Lynch where he was the Global Head of Corporate and Investment Banking. Prior to that, he worked at Lehman Brothers and Goldman Sachs.

				Christian joined Credit Suisse in 2020
Richard John Curran	Managing Director	Eleven Madison Ave., NY, NY 10010	Regional Head of Operations	Americas Regional Head of Trade Support, Client Asset Protection and Cleared Derivatives Operations. Richard has held a variety of management positions within Operations during his tenure, including Trade and Sales Support teams, Reference Data, Domestic and International Settlements, Margin, Treasury Operations and Asset Servicing. He joined Credit Suisse in 1979.
David A King	Director	Eleven Madison Ave., NY, NY 10010	FCM Chief Compliance Officer	CCO of the CSSU FCM business and Compliance coverage for Prime Services within the Investment Banking Division. Prior to assuming his current role, David worked as a Fixed Income Compliance Officer for the Interest Rate Products, Repo, Emerging Markets and Commodities Sales and Trading desks within the Investment Banking Division. He joined Credit Suisse in 2004 with a background in consulting.
Sergio Joseph Lupetin	Managing Director	Eleven Madison Ave., NY, NY 10010	Chief Financial Officer for Credit Suisse Securities (USA) LLC	Head of Legal Entity Finance for the Consolidated US Operations and other Americas Entities. Prior to joining Credit Suisse in 2018, Sergio was the head of US Broker Dealer Regulatory Reporting at Bank of America and before that held a variety of roles in financial and regulatory reporting at Morgan Stanley.
Eric Varvel	Managing Director	Eleven Madison Ave., NY, NY 10010	Chief Executive Officer for Credit Suisse Securities (USA) LLC	President and CEO of Credit Suisse Holdings (USA), Inc. Eric joined the firm in 1990, and during his career at the Bank, Eric has been a member of the Group Executive Board, CEO Investment Banking Division, CEO Asia Pacific, CEO Europe, Middle East and Africa and Chairman Middle East, Asia and Sovereign Wealth Funds. He has spent 30 years at Credit Suisse, across the US, Europe and APAC, and has a unique track record of leading some of our most important businesses.

The Firm's principals noted above have held managerial positions with the Firm or other financial institutions, with experience in a variety of front office, back office, finance, legal and compliance roles. Customers can find additional information regarding the business background of each of the Firm's principals, including previous associations with other institutions in the futures industry, on the website of the National Futures Association (NFA) by conducting a search for a specific principal in NFA's BASIC system (<http://www.nfa.futures.org/basicnet/>). For additional information about the business background of any particular principal, please contact us at list.ld-us-marketing@credit-suisse.com.

Firm's Business

(3) Below is a summary of the significant types of business activities and product lines engaged in by the Firm, and the approximate percentage of the Firm’s assets and capital that are used in each type of activity.

In addition to the Firm’s FCM customer business, which is described in detail in the “**FCM Customer Business**” section below, and its activities as an FCM for its affiliates, the Firm is an SEC-registered securities broker-dealer.¹ In its capacity as a broker-dealer, the Firm provides a variety of capital raising, market making, advisory and brokerage services for governments, financial institutions, high-net-worth individuals and corporate clients, as well as other subsidiaries of Credit Suisse. It is also a primary dealer in U.S. government securities, as well as an underwriter, placement agent and dealer for a wide range of securities (including money market instruments, commercial paper, mortgage and other asset-backed securities, and the debt, equity and convertible securities of corporations and other issuers).

The Firm’s business lines are reflected below as percentages of the Firm’s total assets and its regulatory capital (As of September 30, 2021).

Activity/Product Line	Percentage of Assets	Percentage of Regulatory Capital
Financing (Resales, Borrows)	63.0%	5.5%
Inventory by Business Line		
FICC	10.8%	34.5%
Equities	2.0%	5.8%
Other Inventory	0.3%	3.6%
Goodwill and Intangible Assets	0.6%	6.3%
Receivables from Broker-Dealers and Customers	18.1%	9.0%
Investments in Subsidiaries and Receivable from Affiliates	0.8%	8.3%
Fixed and All Other Assets	4.4%	27.0%

FCM Customer Business

(4) Below is a summary of the Firm’s business on behalf of its customers, in its capacity as an FCM:

- **Types of Customers:** The Firm services predominantly institutional customers, such as asset managers, pensions, insurance companies, banks and corporations, and all of its customers are eligible contract participants.
- **Markets Traded:** The Firm provides FCM services for a variety of futures products (financial, agricultural, energy, security futures) and cleared swaps and security-based swaps.
- **International Businesses:** The Firm, together with other subsidiaries of Credit Suisse, conducts business in Europe, Asia/Pacific and Latin America.
- **Exchange and Swap Execution Facility (SEF) Memberships:** The Firm provides execution services on all principal U.S. futures markets (CME Group, ICE Futures U.S. and others) and access to international markets through other subsidiaries of Credit Suisse and third-party brokers. The Firm is a participant in a number of SEFs.
- **Clearinghouses Used:** The Firm is a direct clearing member of the following clearinghouses for swaps and futures: Chicago Mercantile Exchange, Eurex Clearing, ICE Clear US Inc.,

ICE Clear Europe, ICE Clear Credit LLC, LCH LLC, LCH Limited and The Options Clearing Corporation.

- Carrying Brokers Used: The Firm uses the following carrying brokers for its FCM business:

Carrying Brokers U.S./Non-U.S.	Affiliated with CSSU Y/N
Banco Santander SA	N
Credit Suisse AG, Sydney Branch	Y
Credit Suisse AG, Taipei Securities Branch	Y
Credit Suisse Securities (Canada), Inc.	Y
Credit Suisse Securities (Europe) Limited	Y
Credit Suisse Securities (Japan) Ltd.	Y
StoneX Group	N
Banco de Investimentos Credit Suisse (Brasil) S.A.	Y
Credit Suisse International	Y

- Permitted Depositories and Counterparties: Below is a summary of the Firm’s policies and procedures concerning the choice of bank depositories, custodians and counterparties to permitted transactions under Commission Regulation 1.25.

Permitted Depositories

Credit Suisse’s global network management team (**GNM**) is responsible for selecting, appointing, monitoring and managing relationships with the various bank depositories and custodians (**Banks**) used by the Firm (as well as other subsidiaries of Credit Suisse) for holding customer cash and securities assets.

GNM’s guidelines are designed to provide appropriate levels of protection to customers by using Banks that are considered by Credit Suisse to be secure and competent.

Credit Suisse’s selection criteria require that the Banks: demonstrate appropriate financial soundness; administer a robust internal and external audit and control framework and operational control processes; possess appropriate licenses and regulatory approvals; maintain comprehensive business continuity arrangements; and demonstrate expertise and commitment to high service quality standards.

On an ongoing basis, GNM is responsible for monitoring that Banks used by the Firm and other subsidiaries of Credit Suisse continue to fulfill Credit Suisse’s selection criteria and service requirements. GNM conducts an annual risk assessment that reviews each Bank’s latest financials, internal and external audits, control processes and segregation and protection

of assets. GNM assesses each Bank's responses to confirm that Credit Suisse's requirements continue to be met.

Commission Regulation 1.25 Counterparties

The Firm invests customer funds in compliance with applicable law and in a more narrow range of investments than those permitted under Commission Regulation 1.25. Such investments are internally limited to certain money market mutual funds approved by Credit Suisse's credit risk management and the Firm's senior FCM management. Although Commission Regulation 1.25 permits an FCM to enter into repurchase and reverse repurchase agreements using customer funds and securities if the FCM meets certain conditions, it is the Firm's policy not to enter into such transactions. With respect to customer funds held in the form of cash, the Firm generally does not engage in the investment of such cash as permitted under Commission Regulation 1.25.

- Separate Accounts

The Firm permits certain customers to establish and maintain separate accounts with CSSU. Such separate accounts may be: (i) managed by different asset management firms, introducing brokers or associated persons; (ii) managed as separate investment portfolios by the same asset management firm, introducing broker or associated person; (iii) subject to liens in connection with operating loans that contractually obligate an FCM to treat the accounts separately; or (iv) otherwise required for regulatory or appropriate business purposes. Subject to the terms and conditions of CFTC Letter No. 19-17 (<https://www.cftc.gov/csl/19-17/download>), The Firm treats such separate accounts as accounts of separate entities. Among other things, The Firm may calculate the margin requirements for each separate account independently from all other separate accounts of the same customer and may disburse excess funds from one separate account notwithstanding that another separate account is undermargined.

Among other terms and conditions set out in CFTC Letter No. 19-17, the Firm is required to advise its customers that are permitted to maintain separate accounts that, in the unlikely event of the Firm's bankruptcy, the customer will be treated no differently from other customers, as a result of having maintained separate accounts with the Firm. In particular, all separate accounts maintained for or on behalf of any such customer will be combined in determining such customer's rights and obligations under the applicable provisions of the U.S. Bankruptcy Code and Part 190 of the Commodity Futures Trading Commission's Regulations.

Material Risks

(5) Below is a description of the material risks, accompanied by an explanation of how such risks may be material to its customers, of entrusting funds to the Firm:

- (i) the nature of investments made by the Firm (including credit quality, weighted average maturity and weighted average coupon);

Regulation 1.25 Investments:

The firm typically invests customer funds in a smaller subset of investments than that permitted by Commission Regulation 1.25. Investments are internally limited to certain qualified money market funds. Investments in municipal securities and corporate instruments are excluded and Credit Suisse's specific diversification and concentration limits are applied to all investments. If the Firm has suffered a loss on these investment in circumstances where the Firm is subject to an insolvency proceeding, then a customer

of the Firm may share in those losses on a pro rata basis with other customers carrying positions in the Firm within the same account class as that customer. With respect to customer funds held in the form of cash, the Firm generally does not engage in the investment of such cash as permitted under Commission Regulation 1.25. (For a more detailed description of customer fund segregation, FCM management and investments, see the “**Customer Funds Segregation**” section below.)

Principal Investments:

The Firm holds principal positions in corporate, asset-backed and government securities, as well as derivatives, as part of the businesses described in the “**Firm’s Business**” section above.

The Firm may incur significant losses on its investments due to market fluctuations, including those resulting from unfavorable economic, monetary, political, legal and other developments globally. Concentrations of risk to any one customer type, industry or country could increase these losses, and risk concentration may cause the Firm to suffer losses even when economic and market conditions are generally favorable for other firms. While the Firm employs a variety of instruments and strategies to hedge its exposure to various types of risks in its businesses, those hedging instruments and strategies may not be fully effective in mitigating risk exposure in all market environments or against all types of risk. Incurring substantial trading or investment losses could increase the Firm’s need for liquidity or otherwise adversely affect the Firm’s ability to perform its FCM obligations. For additional information about the market risk faced by Credit Suisse, please see Information on the company – Risk Factors – Market Risk, in Credit Suisse’s Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at;

<https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf>

(ii) the Firm’s creditworthiness, leverage, capital, liquidity, principal liabilities, balance sheet leverage and other lines of business;

Creditworthiness:

In addition to the Firm’s capital and leverage, which are discussed below, another factor that may be relevant to an evaluation of the Firm’s creditworthiness is its credit rating. The Firm is rated A-1 Short term and A+ Long term by S&P. A rating is not a recommendation to buy, sell or hold securities and may be subject to suspension, reduction or withdrawal at any time by the assigning rating agency.

Capital:

The Firm is subject to the SEC’s net capital rule, which requires broker-dealers to maintain a specified level of minimum net capital in relatively liquid form. Compliance with the net capital rule could limit operations that require intensive use of capital, such as underwriting and trading activities and the financing of customer account balances. See Information on the company – Regulation and supervision – Regulatory framework – US – Broker-dealer and asset management regulation and supervision, in Credit Suisse’s Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf>; see also Note 14 – Net Capital Requirements, in the Firm’s Consolidated Statement of Financial Condition

As of the Year Ended December 31, 2020 And Report of Independent Registered Public Accounting Firm, at

<https://www.credit-suisse.com/media/assets/investment-banking/docs/financial-regulatory/llc-fcm/annual/q4-20-cs-securities-bs-only-w-schedules.pdf>

For information about the Firm's capital level, please refer to the Firm's FCM Capital Report on the NFA's website at:

<http://www.nfa.futures.org/basicnet/FCMFinancialsIndex.aspx?entityId=oMwvJtkNrTM%3d>.

Liquidity:

Liquidity, or ready access to funds, is essential to the Firm's businesses. For example, on a daily and intraday basis, the Firm must satisfy variation margin and other obligations to clearinghouses on behalf of its customers and affiliates. The Firm also must finance its trading inventory and extensions of credit to customers. Credit Suisse generally manages the liquidity risk faced by the Firm, as well as its affiliates, on a group-wide basis. Credit Suisse's liquidity and funding policy is designed to ensure that funding is available to meet all obligations in times of stress, whether caused by market events or issues specific to Credit Suisse. For additional information about the liquidity risk management framework of Credit Suisse, please see Information on the company – Risk Factors – Liquidity Risk, in Credit Suisse's Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf>

While Credit Suisse does generally manage its liquidity and funding on a group-wide basis, the Firm also manages its funding and liquidity on a standalone basis using a framework that is consistent with the global policy. This framework is monitored and reviewed by the Federal Reserve, SEC, and the Financial Industry Regulatory Authority. As part of its liquidity risk management policy, the Firm maintains a term funding profile and a significant liquidity portfolio of U.S. Treasuries to support anticipated outflows that may result from an idiosyncratic or market-wide stress. The goal is for the Firm to be able to maintain its existing business and sustain itself under the stress events for a minimum of 90 days. As part of the modeled stress events, any changes in margin and intraday funding requirements are considered. It is potentially possible that the standalone liquidity resources of the Firm may not be adequate if the actual stress event is more severe than what has been modeled. Under this scenario, adverse effects on the Firm's liquidity could inhibit the Firm's ability to perform its FCM obligations.

For additional information about the liquidity and funding management framework of Credit Suisse, please see Treasury, Risk, Balance Sheet and Off-Balance Sheet – Liquidity and funding management, in Credit Suisse's Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at

<https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf>;

Leverage:

As of September 30, 2021, the Firm's measure of leverage (calculated pursuant to the NFA's Financial Requirements Section 16) was 1.33.

Principal Liabilities:

The Firm's principal liabilities consist of short-term borrowings, collateralized short-term financings, obligation to return securities received as collateral, financial instruments sold but not yet purchased, payables to customers, brokers, dealers and others, accounts payable and accrued expenses, subordinated and other long-term borrowings, and other liabilities.

Other Lines of Business:

Please refer to the "**Firm's Business**" section above.

(iii) risks to FCM created by its affiliates and their activities, including investment of customer funds in an affiliated entity;

Affiliated Carrying Brokers:

Funds that customers deposit with the Firm to margin futures and options on futures contracts traded on foreign boards of trade may be held in a foreign futures and foreign options secured amount account in accordance with Commission Regulation 30.7. Such secured amount account may be maintained at an affiliate of the Firm outside of the U.S. that acts as the foreign broker, and may not receive the same level of protection as customer segregated funds held in the U.S. As a general matter, the Firm does not guarantee or otherwise assume liability for the acts or omissions of third parties, including affiliated foreign brokers. If the affiliated foreign broker fails, the broker will be liquidated in accordance with the laws of the relevant jurisdiction, which laws may differ significantly from the U.S. Bankruptcy Code. Standing alone, the likelihood that an affiliated foreign broker will fail is not necessarily greater than the risk that a non-affiliated foreign broker will fail, and may be less, depending on the broker. However, because the activities of the Firm and its affiliates are integrated, the failure of one such entity may cause all of the affiliated companies to fail or be placed in administration within a relatively brief period of time.

Funding Obtained from Affiliates:

The Firm depends in part on funding obtained directly and indirectly from Credit Suisse AG, Credit Suisse's principal operating subsidiary, to meet its liquidity needs. The risks arising from Credit Suisse's liquidity and funding policy are discussed above.

Operational Interdependencies:

Many of the systems, technologies and infrastructures used by the Firm are shared with or provided by its affiliates. As a result, actions or omissions by other affiliates sharing or providing these systems, technologies and infrastructures could increase the operational risk faced by the Firm. (A broader discussion of the Firm's operational risk is provided below.)

Integrated Business:

Operating under an integrated financial services business structure, the Firm and its affiliates seek to provide value-added solutions and access to a broad spectrum of products and services to clients. Such services include, for example, access to non-U.S. exchange-traded products via various affiliated carrying brokers and the facilitation of single currency margining. The Firm's capacity to provide such integrated services depends on the regulatory status and operational capability of affiliates in their respective

jurisdictions. Such interdependency increases the risk of disruption to various segments of the Firm's services.

(iv) any significant liabilities, contingent or otherwise, and material commitments; and

Please refer to the "**Principal Liabilities**" section above.

(v) in addition to the risks noted above, which Commission Regulations require the Firm to disclose, the following other risks that may involve the Firm and/or its affiliates and may be material to a customer considering whether to entrust funds to the Firm:

Credit Risk:

The Firm's businesses are subject to the fundamental risk that customers and counterparties will be unable to perform their obligations. For example, in the Firm's capacity as an FCM, it guarantees the obligations of its customers and affiliates to clearinghouses and carrying brokers, and as a result it is exposed to the credit risk of those customers and affiliates. The Firm is also exposed to the credit risk of clearinghouses and carrying brokers to which it incurs receivables, as well as indirectly to the credit risk of other members of the clearinghouses in which it is a member by virtue of its participation in the loss mutualization frameworks of those clearinghouses. In the Firm's capacity as a securities broker-dealer, it is exposed to the credit risk of its customers, other broker-dealers, clearinghouses and issuers in connection with securities and clearing settlements, contracting derivatives and forward transactions with customers and dealers, and holding bonds in inventory. The Firm also extends credit to customers, generally on a collateralized basis.

The Firm's exposure to credit risk can be exacerbated by adverse economic or market trends, as well as increased volatility in relevant markets or instruments. Defaults by a large financial institution could adversely affect financial markets generally and the Firm specifically as a result of credit, trading, clearing or other relationships between institutions. Although the Firm regularly reviews its credit exposure to specific customers and counterparties and to specific industries, countries and regions that the Firm believes may present credit concerns, and the Firm sets maximum exposure limits for specific customers and counterparties and groups of customers and counterparties, the information that the Firm uses to manage its credit risk may be inaccurate or incomplete. Incurring substantial credit losses could increase the Firm's need for liquidity or otherwise adversely affect its ability to perform its FCM obligations.

For additional information about the credit risk faced by Credit Suisse, please see Information on the company – Risk Factors – Credit Risk, in Credit Suisse's Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf>;

Operational Risk:

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. The Firm's businesses, including its FCM business, face a wide variety of operational risks, including technology risk that stems from dependencies on information technology, third-party suppliers and the telecommunications infrastructure. Operational risk may also arise from errors made in the execution, confirmation or settlement of transactions or in transactions not being properly recorded or accounted for. The Firm's businesses are also exposed to risk from potential non-compliance with policies, employee misconduct or negligence and fraud.

Credit Suisse utilizes the Derivatives Utility from Fidelity Investor Services (FIS) for certain post-trade processing operations for its futures and cleared over-the-counter (OTC) derivatives business. This program may expose Credit Suisse and CSSU to operational risk stemming from errors that could be made by FIS in performing any outsourced functions. While risk management procedures and policies designed to manage such risks are in place, they cannot entirely mitigate Credit Suisse's risk exposure. Credit Suisse also takes a number of measures designed to ensure the availability, integrity and confidentiality of its systems and information, as well as to deter, prevent and detect employee misconduct, however, it is not possible to mitigate all operational risk. The materialization of operational risk could result in trading or investment losses by the Firm, loss of customer funds, or disruption to the Firm's ability to conduct its FCM activities. Credit Suisse is constantly adapting its risk management techniques to reduce its risk exposure as much as possible.

For additional information about the operational risk faced by Credit Suisse, please see Information on the company Risk Factors – Operational Risk, in Credit Suisse's Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf>.

Risk Management:

As discussed below in the “**Risk Practices, Controls and Procedures**” section, the Firm has procedures and policies designed to manage its risk. These procedures and policies, however, may not always be effective, particularly in highly volatile markets. The Firm continues to adapt its risk management techniques, in particular value-at-risk and economic capital, which rely on historical data, to reflect changes in the financial and credit markets. No risk management procedures can anticipate every market development or event, and the Firm's risk management procedures and hedging strategies, and the judgments behind them, may not fully mitigate its risk exposure in all markets or against all types of risk.

DSRO; Location of Annual Audited Financial Statements

(6) (i) Listed below is the Firm's designated self-regulatory organization (**DSRO**) and the DSRO's website address.

The Firm's DSRO, in its capacity as an FCM, is the Chicago Board of Trade:
www.cmegroup.com

(ii) Listed below is the location where the Firm's annual audited financial statements are made available.

Please see the Credit Suisse website for a copy of the Firm's most recent annual audited financial statements:

<https://www.credit-suisse.com/media/assets/investment-banking/docs/financial-regulatory/llc-fcm/annual/q4-20-cs-securities-bs-only-w-schedules.pdf>

Material Complaints or Actions

(7) Below is a description of any material administrative, civil, enforcement or criminal complaints or actions filed against FCM where such complaints or actions have not concluded, and any enforcement complaints or actions filed against the Firm during the last three years.

A description of certain material litigation against the Firm can be found in Credit Suisse's Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at Consolidated financial statements – Credit Suisse Group – Notes to the consolidated financial statements – Note 39 – Litigation <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf>.

Litigation matters involving the Firm are those that reference “CSS LLC.” Updates to this description can be found in the quarterly financial reports filed with the SEC as periodic reports on Form 6-K at <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/2021-q3-6k-group-bank-0411.pdf>. Material litigation against the Firm can also be found in the Firm's Consolidated Statement of Financial Condition As of the Year Ended December 31, 2020 And Report of Independent Registered Public Accounting Firm, at Notes to Consolidated Statement of Financial Condition – Note 19 – Legal Proceedings <https://www.credit-suisse.com/media/assets/investment-banking/docs/financial-regulatory/llc-fcm/annual/q4-20-cs-securities-bs-only-w-schedules.pdf>. In addition, other complaints and actions against the Firm can be found on (a) the website of the NFA by conducting a search for the Firm in NFA's BASIC system (<http://www.nfa.futures.org/basicnet/>) and clicking the “details” link under the “Regulatory Actions” section of the Firm's BASIC profile, and (b) the website of the Financial Industry Regulatory Authority (FINRA) by conducting a search in FINRA's BrokerCheck system (<https://brokercheck.finra.org/>) and reviewing the “Disclosure Events” tab of the Firm's BrokerCheck report.

Customer Funds Segregation

(8) Below is a basic overview of customer fund segregation, FCM management and investments, FCMs and joint FCM/broker dealers.

Customer Accounts. FCMs may maintain up to three different types of accounts for customers, depending on the products a customer trades:

- (i) a **Customer Segregated Account** for customers that trade futures and options on futures listed on U.S. futures exchanges;
- (ii) a **30.7 Account** for customers that trade futures and options on futures listed on foreign boards of trade; and
- (iii) a **Cleared Swaps Customer Account** for customers trading swaps that are cleared on a derivatives clearing organization (**DCO**) registered with the Commission.

The requirement to maintain these separate accounts reflects the different risks posed by the different products. Cash, securities and other collateral (collectively, **Customer Funds**) required to be held in one type of account, *e.g.*, the Customer Segregated Account, may not be commingled with funds required to be held in another type of account, *e.g.*, the 30.7 Account, except as the Commission may permit by order. For example, the Commission has issued orders authorizing ICE Clear Europe Limited, which is registered with the Commission as a DCO, and its FCM clearing members to hold: (i) in Cleared Swaps Customer Accounts, Customer Funds used to margin both (a) Cleared Swaps and (b) foreign futures and foreign options traded on ICE Futures Europe, and to provide for portfolio margining of such Cleared Swaps and foreign futures and foreign options; and (ii) in Customer Segregated Accounts, Customer Funds used to margin both (a) futures and options on futures traded on ICE Futures US and (b) foreign futures and foreign options traded on ICE Futures Europe, and to provide for portfolio margining of such transactions.

Further, Commission rules require the Firm to hold funds deposited to margin futures and options on futures contracts traded on U.S. futures exchanges in Customer Segregated Accounts. Similarly, the Firm must hold funds deposited to margin cleared swaps and futures and options

on futures contracts traded on foreign boards of trade in a Cleared Swaps Customer Account or a 30.7 Account, respectively. In computing its Customer Funds requirements under relevant Commission rules, the Firm may only consider those Customer Funds actually held in the applicable Customer Accounts and may not apply free funds in an account under identical ownership but of a different classification or account type (*e.g.*, securities, Customer Segregated, 30.7) to an account's margin deficiency. In order to be used for margin purposes, the funds must actually transfer to the identically-owned under margined account.

Customer Segregated Account. Funds that customers (**Futures Customers**) deposit with an FCM, or that are otherwise required to be held for the benefit of customers, to margin futures and options on futures contracts traded on futures exchanges located in the U.S., *i.e.*, designated contract markets, are held in a **Customer Segregated Account** in accordance with section 4d(a)(2) of the Commodity Exchange Act (**CEA**) and Commission Regulation 1.20. **Customer Segregated Funds** held in the Customer Segregated Account may not be used to meet the obligations of the FCM or any other person, including another customer.

All Customer Segregated Funds may be commingled in a single account, *i.e.*, a customer omnibus account, and held with: (i) a bank or trust company located in the U.S.; (ii) a bank or trust company located outside of the U.S. that has in excess of \$1 billion of regulatory capital; (iii) an FCM; or (iv) a DCO. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's customers. Unless a customer provides instructions to the contrary, an FCM may hold Customer Segregated Funds only: (i) in the U.S.; (ii) in a money center country;² or (iii) in the country of origin of the currency.

An FCM must hold sufficient U.S. dollars in the U.S. to meet all U.S. dollar obligations and sufficient funds in each other currency to meet obligations in such currency. Notwithstanding the foregoing, assets denominated in a currency may be held to meet obligations denominated in another currency (other than the U.S. dollar) as follows: (i) U.S. dollars may be held in the U.S. or in money center countries to meet obligations denominated in any other currency; and (ii) funds in money center currencies³ may be held in the U.S. or in money center countries to meet obligations denominated in currencies other than the U.S. dollar.

30.7 Account. Funds that **30.7 Customers** deposit with an FCM, or that are otherwise required to be held for the benefit of customers, to margin futures and options on futures contracts traded on foreign boards of trade, *i.e.*, **30.7 Customer Funds**, and sometimes referred to as the **foreign futures and foreign options secured amount**, are held in a **30.7 Account** in accordance with Commission Rule 30.7.

Funds required to be held in the 30.7 Account for or on behalf of 30.7 Customers may be commingled in an omnibus account and held with: (i) a bank or trust company located in the US; (ii) a bank or trust company located outside the U.S. that has in excess of \$1 billion in regulatory capital; (iii) an FCM; (iv) a DCO; (v) the clearing organization of any foreign board of trade; (vi) a foreign broker; or (vii) such clearing organizations or foreign broker's designated depositories. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's 30.7 Customers. As explained below, Commission Rule 30.7 restricts the amount of such funds that may be held outside of the U.S.

Customers trading on foreign markets assume additional risks. Laws or regulations will vary depending on the foreign jurisdiction in which the transaction occurs, and funds held in a 30.7 Account outside of the U.S. may not receive the same level of protection as Customer Segregated Funds. If the foreign broker carrying 30.7 Customer positions fails, the broker will be liquidated in accordance with the laws of the jurisdiction in which it is organized, which laws may differ significantly from the U.S. Bankruptcy Code. Return of 30.7 Customer Funds to the U.S. will be delayed and likely will be subject to the costs of administration of the failed foreign broker in

accordance with the law of the applicable jurisdiction, as well as possible other intervening foreign brokers, if multiple foreign brokers were used to process the U.S. customers' transactions on foreign markets.

If the foreign broker does not fail, but the 30.7 Customers' U.S. FCM fails, the foreign broker may want to assure that appropriate authorization has been obtained before returning the 30.7 Customer Funds to the FCM's trustee, which may delay their return. If both the foreign broker and the U.S. FCM were to fail, potential differences between the trustee for the U.S. FCM and the administrator for the foreign broker, each with independent fiduciary obligations under applicable law, may result in significant delays and additional administrative expenses. Use of other intervening foreign brokers by the US FCM to process the trades of 30.7 Customers on foreign markets may cause additional delays and administrative expenses.

To reduce the potential risk to 30.7 Customer Funds held outside of the U.S., Commission Regulation 30.7 generally provides that an FCM may not deposit or hold 30.7 Customer Funds in permitted accounts outside of the U.S. except as necessary to meet margin requirements, including prefunding margin requirements, established by rule, regulation, or order of the relevant foreign boards of trade or foreign clearing organizations, or to meet margin calls issued by foreign brokers carrying the 30.7 Customers' positions. The rule further provides, however, that, in order to avoid the daily transfer of funds from accounts in the U.S., an FCM may maintain in accounts located outside of the U.S. an additional amount of up to 20 percent of the total amount of funds necessary to meet margin and prefunding margin requirements to avoid daily transfers of funds. An FCM must deposit 30.7 Customer Funds under the laws and regulations of the foreign jurisdiction that provide the greatest degree of protection to such funds, and an FCM may not by contract or otherwise waive any of the protections afforded customer funds under the laws of the foreign jurisdiction.

Cleared Swaps Customer Account. Funds deposited with an FCM, or otherwise required to be held for the benefit of customers, to margin swaps cleared through a registered DCO, *i.e.*, **Cleared Swaps Customer Collateral**, are held in a **Cleared Swaps Customer Account** in accordance with the provisions of section 4d(f) of the Act and Part 22 of the Commission's rules. Cleared Swaps Customer Accounts are sometimes referred to as LSOC Accounts. LSOC is an acronym for "legally separated, operationally commingled." Funds required to be held in a Cleared Swaps Customer Account may be commingled in an omnibus account and held with: (i) a bank or trust company located in the U.S.; (ii) a bank or trust company located outside of the U.S. that has in excess of \$1 billion of regulatory capital; (iii) a DCO; or (iv) another FCM. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's Cleared Swaps Customers.

Investment of Customer Funds. Section 4d(a)(2) of the CEA authorizes FCMs to invest Customer Segregated Funds in obligations of the U.S., in general obligations of any State or of any political subdivision thereof, and in obligations fully guaranteed as to principal and interest by the U.S. Section 4d(f) of the CEA authorizes FCMs to invest Cleared Swaps Customer Collateral in similar instruments.

Commission Regulation 1.25 authorizes FCMs to invest Customer Segregated Funds, Cleared Swaps Customer Collateral and 30.7 Customer Funds in instruments of a similar nature. Commission rules further provide that the FCM may retain all gains earned and is responsible for investment losses incurred in connection with the investment of Customer Funds.

Permitted investments include:

- (i) obligations of the U.S. and obligations fully guaranteed as to principal and interest by the U.S. (U.S. government securities);

(ii) general obligations of any State or of any political subdivision thereof (municipal securities);

(iii) obligations of any U.S. government corporation or enterprise sponsored by the U.S. government (U.S. agency obligations), except that obligations issued by the Federal National Mortgage Association or the Federal Home Loan Mortgage Association are permitted only while these entities operate under the conservatorship or receivership of the Federal Housing Finance Authority with capital support from the U.S.;

(iv) certificates of deposit issued by a bank (certificates of deposit) as defined in section 3(a)(6) of the Securities Exchange Act of 1934, or a domestic branch of a foreign bank that carries deposits insured by the Federal Deposit Insurance Corporation;

(v) commercial paper fully guaranteed as to principal and interest by the U.S. under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (commercial paper);

(vi) corporate notes or bonds fully guaranteed as to principal and interest by the U.S. under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (corporate notes or bonds); and

(vii) interests in money market mutual funds.

The duration of the securities in which an FCM invests Customer Funds cannot exceed, on average, two years.

An FCM may also engage in repurchase and reverse repurchase transactions with non-affiliated registered broker-dealers, provided such transactions are made on a delivery versus payment basis and involve only permitted investments. All funds or securities received in repurchase and reverse repurchase transactions with Customer Funds must be held in the appropriate Customer Account, *i.e.*, Customer Segregated Account, 30.7 Account or Cleared Swaps Customer Account. Further, in accordance with the provisions of Commission Regulation 1.25, all such funds or collateral must be received in the appropriate Customer Account on a delivery versus payment basis in immediately available funds. With respect to customer funds held in the form of cash, the Firm generally does not engage in the investment of such cash as permitted under Commission Regulation 1.25.

No SIPC Protection. Although the Firm is a registered broker-dealer, it is important to understand that the funds you deposit with the Firm for trading futures and options on futures contracts on either U.S. or foreign markets or cleared swaps are not protected by the Securities Investor Protection Corporation.

Additional Information. For additional information on the protection of customer funds, please see the Futures Industry Association's "Protection of Customer Funds Frequently Asked Questions" located at <https://fia.org/articles/protection-customer-funds-frequently-asked-questions>.

Filing a Complaint

(9) Below is information on how a customer may obtain information regarding filing a complaint about the Firm with the Commission or with the Firm's DSRO.

A customer that wishes to file a complaint about the Firm or one of its employees with the Commission can contact the Division of Enforcement either electronically at

<https://forms.cftc.gov/fp/complaintform.aspx> or by calling the Division of Enforcement toll-free at 866-FON-CFTC (866-366-2382).

A customer may file a complaint about the Firm or one of its employees with the NFA electronically at <http://www.nfa.futures.org/basicnet/Complaint.aspx> or by calling NFA directly at 800-621-3570.

A customer that wishes to file a complaint about the Firm or one of its employees with the Chicago Mercantile Exchange electronically at: <http://www.cmegroup.com/market-regulation/file-complaint.html> or by calling the Chicago Mercantile Exchange at 312-341-3286.

Relevant Financial Data

(10) Below is financial data as of the most recent month-end when this Disclosure Document was prepared.

(i) the Firm's total equity, regulatory capital, and net worth, all computed in accordance with U.S. Generally Accepted Accounting Principles and Commission Regulation 1.17, as applicable;

As of September 30, 2021 the Firm's total equity and net worth was \$14,038 million and its regulatory capital was \$21,538 million.

(ii) the dollar value of the Firm's proprietary margin requirements as a percentage of the aggregate margin requirement for Futures Customers, Cleared Swaps Customers, and 30.7 Customers;

As of September 30, 2021 the percentage of the Firm's proprietary margin requirements as a percentage of the aggregate margin requirement for Futures Customers, Cleared Swaps Customers and 30.7 Customers was 2.86 percent.

(iii) the smallest number of Futures Customers, Cleared Swaps Customers, and 30.7 Customers that comprise 50 percent of the Firm's total funds held for Futures Customers, Cleared Swaps Customers, and 30.7 Customers, respectively;

As of September 30, 2021 the smallest number of Futures Customers that comprise 50 percent of the Firm's total funds held for Futures Customers was 17; the smallest number of 30.7 Customers that comprise 50 percent of the Firm's total funds held for 30.7 Customers was 6; and the smallest number of Cleared Swaps Customers that comprise 50 percent of the Firm's total funds held for Cleared Swaps Customers was 8.

(iv) the aggregate notional value, by asset class, of all non-hedged, principal over-the counter transactions into which the Firm has entered;

As of September 30, 2021 CSSU had a gross aggregate notional of approximately \$6.1 billion over-the-counter credit derivative transactions. These transactions primarily hedge or mitigate exposures in the entities consolidated within the firm's Intermediate Holding Company (the "IHC") (which includes CSSU) and contribute to the various risk measures incurred by and required to be calculated by the IHC.

(v) the amount, generic source and purpose of any unsecured lines of credit (or similar short-term funding) the Firm has obtained but not yet drawn upon.

The Firm does not have any committed Firm lines of credit.

(vi) the aggregated amount of financing the Firm provides for customer transactions involving illiquid financial products for which it is difficult to obtain timely and accurate prices;

The Firm does not generally provide financing for customers involving illiquid products that would not be considered marginable securities under U.S. margin rules. If the Firm did provide any such financing, the Firm would comply with all applicable law, rules and regulations, including margin and capital requirements.

(vii) the percentage of Futures Customer, Cleared Swaps Customer, and 30.7 Customer receivable balances that the Firm had to write-off as uncollectable during the past 12-month period, as compared to the current balance of funds held for Futures Customers, Cleared Swaps Customers, and 30.7 Customers.

This percentage as of September 30, 2021 is 0.0 percent.

Additional financial information on all FCMs is also available on the Commission's website at: <http://www.cftc.gov/MarketReports/financialfcmdata/index.htm>.

Customers should be aware that the NFA publishes on its website certain financial information with respect to each FCM. The FCM Capital Report provides each FCM's most recent month-end adjusted net capital, required net capital, and excess net capital. (Information for a twelve-month period is available.) In addition, NFA publishes twice-monthly a Customer Segregated Funds report, which shows for each FCM: (i) total funds held in Customer Segregated Accounts; (ii) total funds required to be held in Customer Segregated Accounts; and (iii) excess segregated funds, *i.e.*, the FCM's residual interest. This report also shows the percentage of Customer Segregated Funds that are held in cash and each of the permitted investments under Commission Regulation 1.25. Finally, the report indicates whether the FCM held any Customer Segregated Funds during that month at a depository that is an affiliate of the FCM. FI

The report shows the most recent semi-monthly information, but the public will also have the ability to see information for the most recent twelve-month period. A 30.7 Customer Funds report and a Customer Cleared Swaps Collateral report provides the same information with respect to the 30.7 Account and the Cleared Swaps Customer Account.

The above financial information reports can be found by conducting a search for a specific FCM in NFA's BASIC system (<http://www.nfa.futures.org/basicnet/>) and then clicking on "View Financial Information" on the FCM's BASIC Details page.

Risk Practices, Controls and Procedures

(11) Below is a summary of the Firm's current risk practices, controls and procedures.

Overview of the Firm's Risk Management Organization

Credit Suisse's risk governance framework is based on a "three lines of defense" governance model, where each line has a specific role and defined responsibilities and works in close collaboration to identify, assess and mitigate risks.

The first line of defense is the front office, which is responsible for pursuing suitable business opportunities within the strategic risk objectives and compliance requirements of Credit Suisse, including primary responsibility for compliance with relevant legal and regulatory requirements and internal controls.

The second line of defense includes functions such as risk management, legal and compliance and product control. It articulates standards and expectations for the management of risk and effectiveness of controls, including advising on applicable legal and regulatory requirements and publishing related policies, and monitors compliance with the same. The second line of defense is separate from the front office and acts as an independent control function, responsible for

reviewing and challenging front office activities and producing independent management information and risk management reporting for senior management and regulatory authorities.

The third line of defense is the internal audit function, which monitors the effectiveness of controls across various functions and operations, including risk management and governance practices.

Credit Suisse's governance includes a committee structure and a comprehensive set of corporate policies which are developed, reviewed and approved by the Board of Directors of Credit Suisse (Board), the Executive Board, their respective committees and Credit Suisse's Chief Risk Officer (CRO) in accordance with their respective authority.

The risk management function is responsible for providing risk management oversight and establishing an organizational basis to manage risk matters.

The Consolidated U.S. Operations & Cayman Islands Branch (CUSO/CIB) CRO organization is independent of CS' FCM business unit, and the CUSO/CIB CRO reports to the CSH USA CEO, Group CRO, and the CSH USA BoD Risk Committee. CUSO/CIB CRO provides risk management oversight and maintains an organizational framework to administer core risk management through its primary functions detailed below:

- Market Risk Management ("MRM") is responsible for the top of the house market risk considerations for CUSO/CIB including, analysis and development of management information, regulatory reporting, back testing and other relevant market risk regulatory requirements, activities and submissions.
- Enterprise Risk Management ("ERM") is responsible for key Enterprise Risk Management functions including Risk Appetite, inclusive of frameworks and statements, Risk Identification Scenario Design, and Capital Adequacy & Stress Testing. Additional responsibilities include development and implementation of the governance framework and management of Board, committee and senior management MI.
- Credit Risk Management is accountable for functional credit risk oversight for CUSO/CIB entities including underwriting and ongoing monitoring of counterparty credit risk, risk appetite, limits and related controls, regulatory interface, and credit policies/procedures.
- Liquidity and Treasury Risk Management primarily monitors and analyzes liquidity positions across CUSO/CIB and independently oversees Treasury in their liquidity planning and funding management activities, while the Non-Traded Market Risk function constitutes the second line of defense (2LoD) for market risks arising from Treasury activities as well as interest rate risks in banking books.
- Non-Financial Risk Management encompasses operational risk and regulatory risk. Key responsibilities include regional risk appetite/limit proposal, monitoring and breach escalation, risk position and regulatory assessment, messaging to senior management, new business and pre-trade approvals, and maintenance of the risk control and governance frameworks.
- CRO Chief Operating Officer provides division-level management support to CUSO, CIB Entities CRO including strategy, financial management, controls and supervision, audit and regulatory commitments, human capital, and other business management mandates.

- Americas Capital & Resolution Planning is responsible for the development, delivery, and ongoing management of CUSO/CIB's capital adequacy and resolution capabilities including the coordination and submission of the annual Capital Plan and U.S. Resolution Plan.

Risk appetite framework

Credit Suisse's risk appetite framework encompasses the suite of policies, processes, controls and systems with which the risk controls are calibrated and the risk profile is managed. The framework is guided by the following strategic risk objectives:

- maintaining firm-wide and certain legal-entity capital adequacy on both a regulatory basis and under stressed conditions;
- promoting stability of earnings;
- ensuring sound management of liquidity and funding risk;
- minimizing reputational risk; and
- managing and controlling business conduct risk.

Credit Suisse's risk management function is an integral part of its business planning process with strong involvement of senior management and the Board. To meet the challenges of a volatile market environment and changing regulatory frameworks, Credit Suisse is working to continuously strengthen risk management. Credit Suisse has comprehensive risk management processes and sophisticated control systems. Credit Suisse is working to limit the impact of negative developments that may arise by carefully managing risk concentrations.

Overview of the Firm's Segregation Risk Management Procedures

The Firm's risk management procedures require that funds deposited by customers to margin or secure futures transactions (whether on a U.S. or non-U.S. exchange) and cleared swaps transactions be maintained in Customer Segregated Accounts, 30.7 Accounts, or Cleared Swaps Customer Accounts, as applicable, with a depository permitted by applicable law and regulation and approved in accordance with the Firm's risk management procedures.

The Firm maintains a residual interest in excess of its targeted level for each of its Customer Segregated Accounts, 30.7 Accounts, and Cleared Swaps Customer Accounts. In establishing the target amount of residual interest, the Firm performs a due diligence inquiry considering various factors related to its FCM business, including but not limited to: the Firm's type of customers, their general creditworthiness and trading activity, the type of markets and products traded by such customers and the Firm itself, the general volatility and liquidity of those markets and products, the Firm's own liquidity and capital needs, and historical trends in customer segregated, secured amount and cleared swap collateral funds balances and customer debits. The Firm reassesses the target residual interest on a quarterly basis.

Additional Information

For additional information about the risk practices, controls and procedures of Credit Suisse, please see Treasury, Risk, Balance sheet and Off-balance sheet – Risk management in Credit Suisse's Annual Report on Form 20-F for the Fiscal Year ended December 31, 2020, at <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/form-20f-2020.pdf> and the related sections of the quarterly financial reports filed with the SEC as periodic reports on Form 6-K at <https://www.credit-suisse.com/media/assets/corporate/docs/about-us/investor-relations/financial-disclosures/sec-filings/2021-q3-6k-group-bank-0411.pdf>.

This version of the Disclosure Document was first used on July 12, 2014 and last updated on October 30, 2021.

¹ As used in this Disclosure Document, the term “affiliate” refers to any person controlling, controlled by or under common control with the Firm.

² Money center countries mean Canada, France, Italy, Germany, Japan, and the United Kingdom.

³ Money center currencies mean the currency of any money center country and the Euro.