

KOR SDR Organization Structure

2021-04-01



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History

| Date | Description of change | Sections Updated |
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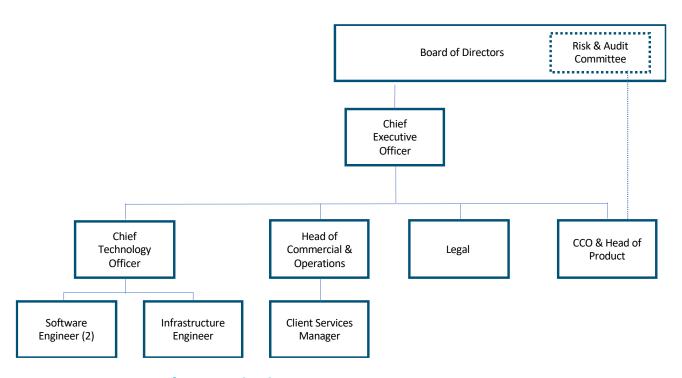
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1. Overview

This document includes an overview of the organization structure of KOR Reporting Inc. delivering Trade Repository services.

2. KOR SDR Organization Structure



3. KOR SDR Job Descriptions

3.1 Chief Executive Officer ("CEO")

The KOR TR¹ CEO is the senior executive responsible for managing all functions and the overall success business of the TR(s). The KOR TR CEO will be part of and accountable for all strategic decisions, work with leadership on tactical plans, and analyze risks to ensure that the necessary steps are taken to minimize such risks.

3.2 Chief Compliance Officer ("CCO")

¹ Trade Repository (TR) is an all-encompassing term that includes Swap Data Repository (SDR) and Security Based Swap Data Repository (SBSDR) for which KOR Reporting Inc. is registered.



The KOR TR CCO will administer and monitor compliance for KOR TR(s) and will report to the Board of Directors for KOR Reporting Inc ("the Board") and the CEO on at least a quarterly basis regarding compliance. With respect to all TR-related matters for which the KOR TR CCO believes he or she needs supervisory direction, including conflicts of interest matters, the KOR TR CCO shall obtain such direction from the CEO or the Board. The KOR TR CCO will, among other things, respond to applicable regulator requests and inquiries and will oversee the process of providing access to KOR TR systems to domestic and foreign regulators. The KOR TR CCO will establish product requirements for KOR TR systems. These tasks will include, among other things, reviews of the validation and reports requirements. The CCO will also participate in system development initiatives for the implementation of features in support of applicable regulator reporting rules, specifications, and guidelines.

The CCO shall always adhere to the duties and requirements as outlined in the KOR Compliance Manual(s) section "Chief Compliance Officer."

3.3 Chief Technology Officer ("CTO")

The KOR TR CTO is responsible for the company's strategy for using technological resources, and to ensure that technologies used are efficient, secure, and effective in meeting KOR TRs regulatory duties and clients' needs. The CTO will be responsible for and manage all technical functions of KOR TR(s) including design, development, testing, infrastructure, and security.

3.4 Head of Commercial, Client Services, and Operations

The KOR TR Head of Commercial, Client Services, and Operations is responsible for sales, marketing, client support and business operations. This role covers the end-to-end experience by KOR TR Clients and all support functions and activities.

4. Jurisdictional Information

At this time KOR does not have any existing or further pending trade repository applications beyond that of a SDR license with the CFTC and the SBSDR with the SEC. This document shall be updated with any changes.

4.1 Other trade repository registrations

| Country | Regulator | Registration Category | Date of Registration | Status of Registration |
|---------|-----------|-----------------------|----------------------|------------------------|
| US | CFTC | SDR | TBD | Pending |
| US | SEC | SBSDR | TBD | To be filed |



5. Appendix A - Exhibits

| Regulator | Exhibit | Exhibit Description |
|-----------|---------|--|
| CFTC | E | Attach as Exhibit E, a narrative or graphic description of the organizational structure of the Applicant. |
| | | Note: If the swap data repository activities are conducted primarily by a division, subdivision, or other segregable entity within the Applicant's corporation or organization, describe the relationship of such entity within the overall organizational structure and attach as Exhibit E only such description as applies to the segregable entity. Additionally, provide any relevant jurisdictional information, including any and all jurisdictions in which the Applicant or any affiliated entity is doing business and registration status, including pending application (e.g., country, regulator, registration category, date of registration). In addition, include a description of the lines of responsibility and accountability for each operational unit of the Applicant to (i) any committee thereof and/or (ii) the board. |
| SEC | F | Attach as Exhibit F a narrative and/or graphic description of the organizational structure of the applicant. Note: If the security-based swap data repository or securities information processor activities of the applicant are conducted primarily by a division, subdivision, or other segregable entity within the applicant's corporation or organization, describe the relationship of such entity within the overall organizational structure and attach as Exhibit F the description that applies to the segregable entity. |