

# **Credit Suisse**



## U.S. Resolution Plan Public Section

December 17, 2021



<sup>&</sup>lt;sup>1</sup> The Public Section will read as its own stand-alone document.



## Statement Regarding Forward-Looking Information

This document contains statements that constitute forward-looking statements. In addition, in the future we, and others on our behalf, may make statements that constitute forward-looking statements. Such forward-looking statements may include, without limitation, statements relating to the following:

- our plans, targets or goals;
- our future economic performance or prospects;
- the potential effect on our future performance of certain contingencies; and
- assumptions underlying any such statements.

Words such as "believes," "anticipates," "expects," "intends" and "plans" and similar expressions are intended to identify forward-looking statements but are not the exclusive means of identifying such statements. We do not intend to update these forward-looking statements.

By their very nature, forward-looking statements involve inherent risks and uncertainties, both general and specific, and risks exist that predictions, forecasts, projections and other outcomes described or implied in forward-looking statements will not be achieved. We caution you that a number of important factors could cause results to differ materially from the plans, targets, goals, expectations, estimates and intentions expressed in such forward-looking statements and that the COVID-19 pandemic creates significantly greater uncertainty about forward-looking statements in addition to the factors that generally affect our business. These factors include:

- the ability to maintain sufficient liquidity and access capital markets;
- market volatility, increases in inflation and interest rate fluctuations or developments affecting interest rate levels, including the persistence of a low or negative interest rate environment;
- the strength of the global economy in general and the strength of the economies of the countries in which we conduct our operations, in particular the risk of negative impacts of COVID-19 on the global economy and financial markets and the risk of continued slow economic recovery or downturn in the EU, the US or other developed countries or in emerging markets in 2021 and beyond;
- the emergence of widespread health emergencies, infectious diseases or pandemics, such as COVID-19, and the actions that may be taken by governmental authorities to contain the outbreak or to counter its impact;
- potential risks and uncertainties relating to the severity of impacts from COVID-19 and the duration of the pandemic, including potential material adverse effects on our business, financial condition and results of operations;
- the direct and indirect impacts of deterioration or slow recovery in residential and commercial real estate markets;
- adverse rating actions by credit rating agencies in respect of us, sovereign issuers, structured credit products or other credit-related exposures;
- the ability to achieve our strategic goals, including those related to our targets, ambitions and financial goals;
- the ability of counterparties to meet their obligations to us and the adequacy of our allowance for credit losses;
- the effects of, and changes in, fiscal, monetary, exchange rate, trade and tax policies;
- the effects of currency fluctuations, including the related impact on our business, financial condition and results of operations due to moves in foreign exchange rates;
- political, social and environmental developments, including war, civil unrest or terrorist activity and climate change;
- the ability to appropriately address social, environmental and sustainability concerns that may arise from our business activities;
- the effects of, and the uncertainty arising from, the UK's withdrawal from the EU;
- the possibility of foreign exchange controls, expropriation, nationalization or confiscation of assets in countries in which we conduct our operations;
- operational factors such as systems failure, human error, or the failure to implement procedures properly;



- the risk of cyber attacks, information or security breaches or technology failures on our reputation, business or operations, the risk of which is increased while large portions of our employees work remotely;
- the adverse resolution of litigation, regulatory proceedings and other contingencies;
- actions taken by regulators with respect to our business and practices and possible resulting changes to our business organization, practices and policies in countries in which we conduct our operations;
- the effects of changes in laws, regulations or accounting or tax standards, policies or practices in countries in which we conduct our operations;
- the expected discontinuation of LIBOR and other interbank offered rates and the transition to alternative reference rates;
- the potential effects of changes in our legal entity structure;
- competition or changes in our competitive position in geographic and business areas in which we conduct our operations;
- the ability to retain and recruit qualified personnel;
- the ability to maintain our reputation and promote our brand;
- the ability to increase market share and control expenses;
- technological changes instituted by us, our counterparties or competitors;
- the timely development and acceptance of our new products and services and the perceived overall value of these products and services by users;
- acquisitions, including the ability to integrate acquired businesses successfully, and divestitures, including the ability to sell non-core assets; and
- other unforeseen or unexpected events and our success at managing these and the risks involved in the foregoing.

We caution you that the foregoing list of important factors is not exclusive. When evaluating forward-looking statements, you should carefully consider the foregoing factors and other uncertainties and events, including the information set forth in "Risk factors" in I - Information on the company in our Annual Report 2020 and in "Risk factor" in I - Credit Suisse results - Credit Suisse in our 1021 Financial Report.



## 1. Executive Summary

## **1.1 Introduction**

Credit Suisse Group AG, referred to herein as "Credit Suisse" or "CS" or "Group", is pleased to submit this Public Section to the Board of Governors of the Federal Reserve System (FRB) and the Federal Deposit Insurance Corporation (FDIC) (together, the Agencies) as part of our 2021 targeted U.S. resolution plan submission (2021 Plan or Plan). As this year's Plan shows, Credit Suisse remains committed to resolution planning, which we consider a core component of our strength and central to the financial stability of the United States.

CS appreciates the engagement and the feedback provided by the Agencies throughout the development phase of the 2018 Resolution Plan cycle (2018 Plan) and ensuing interactions leading up to the 2021 submission. We continue to bear in mind the lessons learned from the 2007-08 financial crisis and firmly believe that resolution planning is a critical element of systemic regulation to help protect the soundness of the global financial system. Accordingly, we continue to prioritize resolution planning in day-to-day activities.

In December 2020, the Agencies informed CS that it had satisfactorily addressed the shortcomings identified in the Agencies' 2018 feedback letter and completed certain remaining resolvability enhancements contemplated in the 2018 Plan. The assessment was a significant milestone for Credit Suisse and reinforced the belief in our ability to resolve the U.S. operations in an orderly manner, with minimal disruption to the broader financial markets.

#### What is an Intermediate Holding Company or IHC?

The Federal Reserve Board's Regulation YY implements enhanced prudential standards for specific companies supervised by the FRB, including foreign banking organizations (FBOs) such as Credit Suisse. Among other requirements, the FRB's Regulation YY requires a FBOs with \$50 billion or more in total U.S. non-branch assets to establish a U.S. intermediate holding company and hold its entire ownership interest in each U.S. subsidiary (excluding each section 2(h)(2) company or DPC branch subsidiary, if any) through its U.S. IHC. Credit Suisse designated Credit Suisse Holdings (USA), Inc. as its IHC as of July 1, 2016.

In keeping with previous submissions, this Public Section accompanies a Confidential Section, which describes in greater specificity CS' financial capabilities, including the availability of financial resources, liquidity, and capital, to meet potential U.S. resolvability needs.

The 2021 Plan also provides details around operational readiness to wind down our U.S. portfolios and the governance contemplated in periods of stress and resolution.

#### Credit Suisse 2021 Resolution Plan

It also summarizes changes made to our management structure at the beginning of 2021 due to market developments. Lastly, the Plan recaps how CS fared as a result of the COVID-19 pandemic and lessons learned.

The remainder of this Public Section:

- Summarizes Credit Suisse's U.S. resolution planning governance;
- Provides an overview of Credit Suisse and discusses certain recent events;
- Summarizes Credit Suisse's U.S. operations;
- Discusses Credit Suisse U.S. resolution strategy and its preferred global single point of entry strategy;
- Summarizes Credit Suisse's key resolution capabilities; and
- Provides a brief overview of Credit Suisse's response to the Agencies' targeted information request (discusses the linkages between CS's response to the COVID-19 pandemic and CS's resolution-related capabilities, and how CS is applying lessons learned to its resolution planning infrastructure).

## **1.2 Resolution Governance**

Credit Suisse approved the 2021 Plan only after rigorous scrutiny from stakeholders, senior management, and governance bodies. For business-as-usual (BAU) activities, a steering committee (StC) comprising senior management from our Combined US Operations (CUSO) and CS Holdings (USA), Inc. (CSH USA) oversees day-to-day monitoring of our resolution preparedness. The primary responsibility of the StC is to provide a robust review of BAU CUSO resolution planning capabilities.

It is worth mentioning that the development of the 2021 Plan included multiple functions within CS, including, but not limited to, the treasury, capital management, business lines, operations and payments, clearing and settlement groups, internal counsel and audit, U.S. and Group recovery and resolution planning functions. The multiple layers of vetting are intended to make sure that the information provided to the public and the Agencies is accurate and creditworthy.

The Board of CSH USA is closely involved in Credit Suisse's U.S. resolution planning processes. CSH USA Board members are kept informed of essential resolution-related topics and developments, including regulatory interactions and submissions. The U.S. Resolution Planning team also works closely with the Zurich-based global Recovery and Resolution Office (RRO) to ensure alignment with CS' efforts to develop global resolution capabilities.



## 1.3 About Credit Suisse

Credit Suisse is a leading global financial services company that operates across various geographical markets, including Europe, the Middle East, Africa (EMEA), the Americas, and the Asia Pacific region. Founded in 1856 in Switzerland, CS today has a global reach with operations in about 50 countries and over 49,000 employees representing over 150 different nations. Our broad footprint helps us generate a more geographically balanced stream of revenues and net new assets and allows us to capture growth opportunities around the world.

We seek to follow a balanced approach with our wealth management activities, aiming to capitalize on both the large pool of wealth within mature markets as well as the significant growth in wealth in Asia Pacific and other emerging markets. Our strategy builds on Credit Suisse's core strengths: its position as a leading global wealth manager, its specialist investment banking capabilities, and its strong presence in our home market of Switzerland.

Since July 30, 2020, CS has announced a series of structural improvements designed to improve effectiveness further, drive efficiencies and capture future growth opportunities. As of December 2021, we serve our clients through three regionally focused divisions: Swiss Universal Bank, International Wealth Management and Asia Pacific. These regional businesses are supported by our Asset Management and Investment Bank divisions. Other structural improvements are expected to apply as of 2022.

*Swiss Universal Bank*: The Swiss Universal Bank division offers comprehensive advice and a wide range of financial solutions to private, corporate, and institutional clients primarily domiciled in our home market of Switzerland, which offers attractive growth opportunities and where we can build on a solid market position across our key businesses. Our Private Clients business has a leading franchise in our Swiss home market and serves ultra-high-net-worth and high-networth individuals, affluent and retail clients. Our Corporate & Institutional Clients business serves large corporate clients, small and medium-sized enterprises, institutional clients, external asset managers, financial institutions, and commodity traders.

International Wealth Management: The International Wealth Management division offers comprehensive advisory services and tailored investment and financing solutions to entrepreneurial, ultra-high-net-worth and high-net-worth individuals, classic private banking clients and external asset managers. In Europe, the Middle East, Africa, and Latin America, we serve our clients along a client-centric and needs-based delivery model, utilizing the broad spectrum of CS' global capabilities.

Asia Pacific: The Asia Pacific division delivers integrated wealth management, financing, underwriting, and advisory offering to our target ultra-high-net-worth, entrepreneur, and corporate clients. We provide a comprehensive suite of wealth management products and services to our clients in Asia Pacific and provide a broad range of advisory services related to debt and equity underwriting of public offerings and private placements as well as mergers and acquisitions. Our close collaboration with the Investment Bank supports and enables our wealth management activities in the region through the delivery of holistic, innovative products and tailored advice.

## **Combined U.S. Operations**

*Investment Bank*: The Investment Bank division delivers client-centric sales and trading products, services, and solutions across all asset classes and regions, as well as advisory, underwriting, and financing services. Our range of products and services includes global securities sales, trading and execution, prime brokerage, capital raising, and comprehensive corporate advisory services. Additionally, our Global Trading Solutions platform provides centralized trading and sales services to the Group's other business divisions. Our clients include financial institutions and sponsors, corporations, governments, ultra-high-net-worth individuals, sovereigns, and institutional investors.

Asset Management: The Asset Management division offers investment solutions and services globally to a broad range of clients, including pension funds, governments, foundations and endowments, corporations and individuals, with a strong presence in our Swiss home market. Backed by the Group's global presence, Asset Management offers active and passive solutions in traditional investments as well as alternative investments.

We apply environmental, social and governance (ESG) criteria at various points in the investment process with an active sustainability offering, which invests in line with the Credit Suisse Sustainable Investment Framework, and passive ESG index and exchange traded funds.

Please see Section 2 ("Our U.S. Operations") for additional details.



## **1.4 Recent Developments**

## Archegos Capital Management Report

On July 29, 2021, Credit Suisse published the report of the independent external investigation into CS' relationship with Archegos Capital Management, the U.S. hedge fund that defaulted on March 25, 2021. The report was based on interviews of current and former CS employees and an extensive review of pertinent documents.

Among some of the key conclusions, the investigation found a failure to effectively manage risk in the Investment Bank's Prime Services business by both the first and second lines of defense as well as a lack of risk escalation. In the same business, it also found a failure to control limit excesses across both lines of defense as a result of an insufficient discharge of supervisory responsibilities in the Investment Bank and in Risk, and a lack of prioritization of risk mitigation and enhancement measures (such as dynamic margining).

However, the investigation also found that this was not a situation where the business and risk personnel engaged in fraudulent or illegal conduct or acted with ill intent. Nor was it one where the architecture of risk controls and processes was lacking, or the existing risk systems failed to operate sufficiently to identify critical risks and related concerns. The Credit Suisse Group Board of Directors and Executive Board reiterated that they fully share the concerns raised by the report. Actions taken following the Archegos matter include, but are not limited to, the following:

- Performing a thematic review of all large group-wide exposures, as well as the revision of limit excess controls and escalation requirements.
- Taking immediate action on relevant personnel at all levels, across first and second lines of defense.
- Carrying out a review across all businesses and legal entities to identify possible conflicts of interests and to clearly separate sales/client responsibilities from risk functions already within the first line.
- Reviewing options to strengthen a holistic, comprehensive approach to risk management, including introducing stronger escalation protocols particularly around limit excesses to more senior levels — and taking further steps to promote a speak-up culture across the bank.

The report as well as detailed information on the Credit Suisse response is available on the Investor Relations section of our corporate website.

## **Business Restructuring**

Effective August 1, 2020 CS created a single, globally integrated Investment Bank division through the combination of its former Global Markets, Investment Banking & Capital Markets and Asia Pacific Markets businesses to achieve critical scale. CS also launched a new Sustainability, Research & Investment Solutions (SRI) function at the Executive Board level, underlining the sharpened focus on sustainability. Additionally, effective April 1, 2021, the Asset Management business was separated from the International Wealth Management division and managed as a new division of the Group.



## 2. Our U.S. Operations

## 2.1 Introduction

CS continues to maintain a relatively less complex operating model in the U.S. compared to some of our peers. Since the 2007-08 financial crisis, we have significantly reduced risk in various businesses, which the current footprint in the country reflects. Our New York Branch is not a member of, and the FDIC does not insure its deposits. CS' most extensive U.S. presence is through its broker-dealer-related businesses. Typically, broker-dealer activities are resolved with a rapid runoff of the businesses as long as the resolution strategy is supported by adequate operational capabilities, such as transferring client accounts to peer institutions while causing minimal disruptions to the broader financial markets.

Our funding model in the U.S. means that, in the unlikely event of a U.S. Single Point of Entry (SPOE) resolution, losses would be borne by Credit Suisse AG, the sole shareholder and sole material creditor of CSH USA. The positioning of considerable capital and liquidity resources in the U.S. facilitates SPOE and minimizes the risk that the resolution of CS' U.S. operations would cause systemic distress. These resources include capital required by the stress capital buffer rule, recapitalization resources provided by the long-term debt component of the internal total loss absorbing capacity rule, and liquidity positioned as part of the Reg YY buffer requirements and liquidity coverage ratio rule.

## 2.2 Material Legal Entities (MLEs)

#### What is a material legal entity or MLE?

As defined in the final regulations implementing Section 165(d) of the Dodd-Frank Act, Credit Suisse's MLEs are subsidiaries or foreign offices of the covered company that are significant to the activities of a critical operation (CO) or core business line (CBL).

CS conducts an annual review of all its legal entities and branches to classify the material legal entities (MLEs) across all regions. CS legal entities and branches were evaluated in early 2021 for materiality using the following criteria:

- Entities and branches with third-party balance sheet assets greater than Swiss Francs (CHF) 10 billion as of December 31, 2020.
- Entities and branches that are essential to the CS global funding model.
- Entities and branches in which a significant share of the business conducted by Critical Operations (COs) and Core Business Lines (CBLs) is booked.
- Entities and branches that provide substantial services to the activities of a CO or CBL.

Exhibit 2.2-1: 0.5. Material Legal Entities					
Entity	Туре	Business Purpose			
CS Holdings (USA), Inc.	Financing Entity	Designated as the IHC			
CS (USA), Inc.	Financing Entity	Invests in its core subsidiaries and also provides guarantees			
CS Securities (USA) LLC. (CSSU)	Operating Entity	Trades in cash securities, securities borrowing / lending			
CS Capital LLC (CS Capital)	Operating Entity	Provides Prime Services			
CS Management LLC	Operating Entity	Carries out derivatives transactions to hedge positions of U.S. affiliates primarily with other CS affiliates			
CS AG, New York Branch	Operating Entity	Lends to Ultra High Net Worth clients and market maker in U.S. government and agency securities, facilitating HQLA sourcing for affiliates			
CS Services (USA) LLC	Servicing Entity	Maintains critical staff / resources to support U.S. operating entities			

#### Exhibit 2.2-1: U.S. Material Legal Entities

The 2021 Plan details the U.S. SPOE resolution strategy for CS' U.S. operations. In addition, set out below is the strategy for each U.S. MLE - please refer to Section 3.2 ("U.S. Resolution Strategy") below for more details.

## 2.3 Core Business Lines (CBLs)

Credit Suisse operates through five divisions. Three are regionally focused: Swiss Universal Bank, International Wealth Management, and Asia Pacific. Our Investment Bank and Asset Management divisions support these regional businesses. CS adopted the definition of CBL based on the guidance provided by our host regulators, including the Agencies, the Prudential Regulation Authority (PRA), and our home (Swiss) regulator, Swiss Financial Market Supervisory Authority (FINMA).



## Exhibit 2.3-1: 2021 Global Core Business Lines (CBLs)

Credit Suisse Division	Core Business Line (CBL)				
Swiss Universal Bank	<ul> <li>Corporate and Investment Bank</li> <li>Institutional Clients</li> <li>Private &amp; Wealth Management Clients</li> </ul>				
International Wealth Management	Private Bank				
Investment Bank	<ul> <li>Equities</li> <li>Global Trading Solutions (GTS)</li> <li>Credit</li> </ul>				
Asia-Pacific (APAC)	<ul><li>Private Banking</li><li>Strategic Products</li></ul>				

Note: Effective April 1, 2021, the Asset Management business was separated from International Wealth Management and managed as a new division of the Group. The 2021 CBL analysis was conducted before this announcement.

## U.S. CBLs

The CBLs within Credit Suisse's U.S. operations fall under the Investment Bank division. This division supports all three U.S. CBLs: Equities, Global Trading Solutions, and Credit. Furthermore, the Equities CBL includes our Prime Services and Cash Equities businesses.

#### What is a Core Business Line or CBL?

As defined in the final regulations implementing Section 165(d) of the Dodd-Frank Act, Credit Suisse's core business lines (CBLs) are those that, in our view, upon failure would result in a material loss of revenue, profit, or franchise value. Both quantitative and qualitative assessments are factored into the final determination of the CBLs.

*Credit* is a leading, client-focused franchise, providing valueadded products and solutions to the issuer and investor clients in the capital markets space. CS' capital markets businesses are responsible for structuring, underwriting, and syndicating a full range of products for our issuer clients, including investment grade and leveraged loans, investment grade and high yield bonds, and unit transactions.

Global Trading Solutions (GTS) was created within the Investment Bank through the combination of the businesses of International Trading Solutions (ITS) and Asia Pacific Solutions. GTS is a joint venture among the Investment Bank, International Wealth Management, Swiss Universal Bank and Asia Pacific divisions and provides centralized trading and sales services to institutional and private clients.

*Equities* comprises of two business lines: *Prime Services* and *Cash Equities*. The Prime Services franchise offers hedge funds and institutional clients execution, financing, clearing, and reporting capabilities across various asset classes through prime brokerage, synthetic financing, and listed and OTC derivatives. The Cash Equities franchise provides a comprehensive suite of offerings, including research, analytics, and other content-driven products, as well as sales and trading services to our clients.



## 3. Group versus U.S. Resolution Strategies

## 3.1 Group Resolution Strategy

At the Group-level, our approach to resolution is a SPOE resolution strategy that involves only Credit Suisse Group AG going into resolution. At the same time, all operating entities remain solvent, thereby maximizing value and minimizing the disruption to customers and the broader financial markets and maximizing value to new shareholders (previous creditors) by leaving a viable residual entity with an appropriate risk profile and adequate financial resources. While it is impossible, ex ante, to predict how a resolution event would unfold, CS expects that FINMA would employ CS' global SPOE strategy. This strategy would not involve the bankruptcy of CSH USA, or insolvency of any other U.S. entities.

#### What is a Single Point of Entry (SPOE) resolution strategy?

The SPOE resolution strategy contemplates that only a financial company's top-level holding company would go into bankruptcy proceedings, with losses shouldered by its creditors. At the same time, available financial resources are down-streamed to the underlying subsidiaries that allow them to continue to operate as going concerns. Resolving the entire Group without disrupting the broader financial markets is the critical goal of this resolution method.

As a Global Systemically Important Bank (G-SIB), Credit Suisse is proactively working with FINMA, Switzerland's independent financial-markets regulator, to develop and implement Group-wide resolution-critical capabilities.

## 3.2 U.S. Resolution Strategy

In accordance with assumptions required by U.S. law, Credit Suisse's U.S. resolution strategy contemplates CSH USA entering Chapter 11 bankruptcy proceedings, while its MLE subsidiaries and CS AG, New York Branch remain solvent and wind-down most positions outside of proceedings. Structuring losses so they are realized by CSH USA means those losses will, ultimately, be borne by CS AG.

As mentioned before, we view a resolution of our U.S. operations as improbable, given the Group strategy, reduction in size and complexity of Credit Suisse's U.S. operations since the 2007-08 financial crisis, the strengthening of capital and risk management frameworks resulting from the annual Comprehensive Capital Analysis and Review (CCAR) conducted by the FRB, strengthening of liquidity, and cash management practices and related operational and governance enhancements.

#### What is Credit Suisse's U.S. Resolution Strategy?

In line with expectations of the final regulations implementing Section 165(d) of the Dodd-Frank Act, our U.S. resolution strategy contemplates using the SPOE approach. Under this framework, only the top U.S. holding company (Credit Suisse Holdings (USA), Inc., also referred to as CSH USA or the IHC) will enter insolvency proceedings in U.S. courts. Our broker-dealer and other U.S. entities will undergo a solvent wind-down. The New York Branch will remain open but will wind-down the bulk of its businesses, barring specific U.S. Dollar funding activities to support surviving franchises overseas.

Overall, the U.S. resolution strategy is designed to accomplish the following objectives:

- Only have CSH USA (U.S. IHC) enter bankruptcy proceedings.
- Make sure all underlying subsidiaries have adequate capital, liquidity, and operational support to keep functioning to wind-down their businesses outside of court proceedings in an orderly manner.
- Keep the New York Branch open to wind-down the bulk of its businesses while maintaining limited operations related to sourcing HQLA and U.S. dollars.
- Assure that CS Services (USA) LLC (U.S. Service Company) remains operational to provide resolutioncritical support to the businesses until all critical operations in the United States are wound down.
- Minimize fire sales of assets to reduce the risk of unsettling the United States and broader financial markets.
- Eliminate any need for support from the U.S. government and taxpayers.

#### Exhibit 3.2-1: Resolution strategies for U.S. entities

Entity	Resolution Strategy
CS Holdings (USA), Inc.	Enter bankruptcy proceedings
CS (USA), Inc.	Maintain: Remain operational until unwind of other U.S. MLEs is completed (driven by leases)
CS Securities (USA) LLC.	Unwind: Positions will be unwound as orderly and symmetrically as possible
CS Capital LLC (CS Capital)	Unwind: Positions will be unwound as orderly and symmetrically as possible
CS Management LLC	Unwind: Positions will be unwound as orderly and symmetrically as possible
CS AG, NY Branch	Maintain U.S. Treasury - U.S. Government/ Agency businesses Unwind: Securitized Products and other remaining businesses
CS Services (USA) LLC	Maintain through Resolution: CS Services to remain operational until support no longer required by U.S. MLEs

At the completion of resolution, CS' U.S. presence would be limited to New York Branch's sourcing of U.S. Dollar HQLA for CS AG through its U.S. Government / Agency business. All other U.S. entities would be dissolved. CS' wind-down analysis indicates that some illiquid positions may not be unwound within the 12-month wind-down period. Assuming the residual portfolio persists following the dissolution of CSH



USA, it would be distributed to CS AG as the shareholder of CSH USA. CS AG will determine how to dispose of the assets including, if required, by engaging a U.S. custodian to hold the assets on its behalf in the U.S. prior to disposal.

Lastly, our U.S. resolution strategy relies on a few key assumptions, consistent with expectations from the Agencies, which includes:

- Credit Suisse's U.S. operations experience material financial distress and the foreign parent is unable or unwilling to provide sufficient financial support for the continuation of U.S. operations resulting in at least the designated IHC (CSH USA) files for bankruptcy under Title 11 of the U.S. Code.
- No significant recovery actions (e.g., large-scale reduction in assets or sale of business units) occur during the runway period (just before entering the resolution phase) to help mitigate the risk of bankruptcy, and unsecured funding is not available immediately prior to the bankruptcy filing.
- Credit Suisse does not receive extraordinary government support from the United States or any other government to prevent its failure.
- Within the context of the applicable idiosyncratic scenario, markets are functioning and competitors are in a position to take on business.
- Access to financial market utilities (FMUs) and other critical external financial market conduits are available during the resolution phase.

The stability afforded by an SPOE strategy means we can wind down our businesses in an organized fashion while limiting disruption to the U.S. financial markets. Since our operating MLEs would remain solvent, CS' U.S. resolution will not entail defaults on its obligations, collateral liquidations by repo and derivative counterparties, fire sales of assets to generate liquidity, trapped customer assets, or potentially competing for insolvency proceedings and interests. These are actions that typically cause inescapable disruptions through ripple effects in the financial markets.



## 4. Readiness to Support Resolvability

To support our U.S. resolution strategy, we have worked diligently to build and enhance resolvability capabilities beginning in 2016. These capabilities are designed so that Credit Suisse has appropriate structural, operational, and financial capabilities to support its resolution strategy. In addition, we have made changes to our funding arrangements, pre-positioned intercompany debt, and enabled MLEs to hold High Quality Liquid Assets (HQLA) directly. As a result, liquidity resources (often the biggest driver of a resolution-type crisis) have been pre-positioned to make sure that CS has sufficient assets at the appropriate places to execute its wind-down strategy. Moreover, as mentioned earlier, CS successfully addressed the concerns raised by the Agencies regarding our resolution capabilities arising from the 2018 submission.

## 4.1 Structural Readiness

The structural mechanism capabilities aim to identify and quickly respond to stress events through the CSH USA Board and management actions outlined in pre-determined trigger frameworks, escalation protocols, and communications strategies detailed in our governance playbook. To that end, CS continues to maintain quantitative triggers linked to specific actions to facilitate efficient and effective communication and decision-making as levels of stress increase. The trigger framework and escalation protocols facilitate decisions are made promptly in the appropriate management or governance forum.

To enable timely resolution actions, in 2018 CS established the U.S. Resolution Crisis Committee. Chaired by the CSH USA CEO, this committee includes senior management and personnel who have vital roles to play in the actions and decision-making required during the resolution continuum. By including a limited number of appropriate representatives from functions who play essential roles in resolution activities, the U.S. Resolution Crisis Committee can make decisions promptly, when required.

When necessary, the U.S. Resolution Crisis Committee will escalate issues and decisions upstream to the CSH USA and CS Group Boards of Directors. Likely escalation topics include issues related to U.S. resolution action execution, critical choices concerning the implementation of U.S. resolution actions, and communication of material risks to solvent wind-down execution. Though we hope this committee never convenes, membership and the charter is reviewed and kept up-to-date to meet any eventuality. The other tenant of the structural mechanisms capabilities framework is the Legal Entity Rationalization (LER) Criteria program. These criteria, akin to internal company rules, are designed to protect and facilitate essential features of CS' resolvability, notwithstanding changes to business activities and structure. Among other things, these criteria facilitate the availability of FMUs and other critical shared services during resolution while minimizing complex interconnectedness between CS AG, New York Branch, and non-branch entities that may complicate the wind-down process.

## 4.2 Financial Readiness

Financial readiness to meet the needs of a resolvability scenario goes to the heart of resolution planning. At CS, we continue to improve our financial preparedness-related capabilities, both locally in the U.S. and at the Group-level. Notable enhancements have been made to address potential financial vulnerabilities in resolution across derivatives and trading, liquidity, and capital management practices.

These enhancements are integrated into BAU liquidity and capital management and related governance. Finally, last year, we successfully remediated the shortcomings identified in the 2018 Plan, including enhancing our cash management and liquidity projection frameworks and establishing a resolution capital monitoring and reporting structure.

The Support Agreement Structure is designed to facilitate our U.S. SPOE strategy by providing a stress-resilient contractual framework so that contributable resources are available for the wind-down activities in a manner that minimizes the risk of successful creditor challenge. The purpose of the Support Agreement Structure is to oblige CSH USA to build up a pool of contributable resources at CS (USA), Inc. in BAU, which CS (USA), Inc. can use following the runway period to provide capital and liquidity support to its MLE subsidiaries from the runway period and into resolution.

To ensure support is timely provided, the Support Agreement Structure refers to the trigger framework CS has developed for CSH USA Board of Directors and management decision making. The Support Agreement Structure is designed to operate under pre-arranged contractual terms that would not require any further approval by any CS Board of Directors or regulators.



## **Capital Management**

The goal of capital management in a resolution context is to estimate each non-branch MLE's capital needs to make sure each entity has adequate capital to execute a wind-down of its operations. Based on the feedback from the Agencies, and as articulated in our 2020 U.S. Resolution Plan (2020 Plan), CS completed a multi-stage program in 2020 to calibrate and implement our Resolution Capital Execution Need (RCEN) triggers and associated monitoring and reporting framework that explicitly takes into account management's forecasts of losses and other balance sheet changes that would occur in the resolution period.

#### What is Resolution Capital Execution Need (RCEN)?

RCEN is the estimated minimum amount of capital needed to support each non-branch entity after the bankruptcy filing to execute a solvent wind-down. It comprises two key components for each material legal entity - a "well-capitalized" target plus a buffer for expected capital depletion over the resolution period.

We continue to monitor and report on the RCEN and RCEN trigger levels as part of our BAU work related to resolution planning. These actions are intended to enable timely escalation of information regarding CS' resolution resource needs as necessary.

Based on the experience of the 2007-08 financial crisis, we continue to believe that resolution of a well-capitalized firm like Credit Suisse would be a liquidity-driven event. Therefore, our capital triggers are not meant to initiate actions to file for bankruptcy of the U.S. holding company (CSH USA). Instead, triggers that would signal a possible bankruptcy filing continue to be liquidity-driven. For example, the point of non-viability (PONV) - the point where CS will have to file for bankruptcy - is linked to a liquidity trigger.

Credit Suisse implemented a robust capital management framework at the CSH USA consolidated level in order to address the needs of stakeholders and to facilitate compliance with relevant regulatory requirements. This includes the establishment of internal capital goals, targets and triggers, quantitative and qualitative guidelines for capital actions, strategies for addressing potential capital shortfalls and internal governance procedures around capital management for CSH USA.

This also includes ensuring adequate loss-absorbing capacity, i.e. Total Loss Absorbing Capacity (TLAC) capital at the holding company level and adequate capital at the material legal entity subsidiary level to execute our preferred resolution strategy, which is to recapitalize our participating material entities so they could continue to operate while the

#### Credit Suisse 2021 Resolution Plan

parent company is in bankruptcy and Credit Suisse executes an orderly wind-down of its U.S. operations. As a result, CS' capital levels are held well over the regulators' minimum regulatory requirements, for both going concern and gone concern capital, as shown below.

## Exhibit 4.2-1: Key Capital Ratios

Regulatory Capital	Actual as of June 30, 2021	Minimum Requirement		
CET1 Ratio	26.4%	4.5%		
Tier 1 Capital Ratio	27.2%	6.0%		
Total Capital Ratio	27.3%	8.0%		
Leverage Ratio	17.4%	4.0%		
Supplementary Leverage Ratio	15.0%	3.0%		
Capital Conservation Buffer	19.3%	6.9%		

TLAC and TLAC-eligible Long Term Debt (eLTD)	Actual as of June 30, 2021	Minimum Requirement	
TLAC to RWA	35.9%	16.0%	
TLAC to Leverage	22.9%	8.0%	
TLAC to Supplementary Leverage	19.7%	6.0%	
eLTD to RWA	8.7%	6.0%	
eLTD to Leverage	5.5%	3.5%	
eLTD to Supplementary Leverage	4.8%	2.5%	
TLAC to RWA Buffer	19.9%	2.5%	

## **Liquidity Management**

Resolution-related liquidity management aims to estimate and position each non-branch MLE's liquidity needs to ensure each entity has adequate resources to meet its contractual and contingent obligations and execute an orderly wind-down of its operations. The central component of our liquidity risk management structure is the Resolution Liquidity Execution Need (RLEN) projection capability. A non-branch MLE's RLEN is calculated as the sum of the MLE's Minimum Operating Liquidity and Peak Funding Need during the resolution period. Sufficient liquidity, determined by the RLEN framework results, is available to each subsidiary MLE to ensure solvency through resolution.

#### What is Resolution Liquidity Execution Need (RLEN)?

RLEN is the estimate of the liquidity that each of CS' U.S. material legal entities requires stabilizing itself and operating post-filing of the bankruptcy of the IHC in support of our resolution strategy. It comprises two key components: Minimum Operating Liquidity and Peak Funding Need. The first measures the liquidity needed at each entity to continue operating post-filing, taking into account intra-day requirements, operating expenses, and working capital needs. The latter measures the peak level of cumulative net outflows during the stabilization period based on daily cash flow forecasts by an entity.

Based on the feedback from the Agencies, and as articulated in our 2020 Plan, CS completed several enhancements to its liquidity and cash management activities to meet regulatory expectations. These enhancements include improvements to



the capabilities for RLEN forecasting and reporting frequencies.

Several short-term mitigating projects were completed to enable CS to meet the regulators' expectations regarding its RLEN framework, specifically around controls, testing, and frequency of liquidity forecasting and reporting capabilities. As a result, we can perform liquidity projections that are repeatable and controlled and refresh these calculations ondemand and promptly.

In response to the Agencies' feedback on our cash management practices, we launched a comprehensive Intraday Liquidity & Cash Forecasting program to address these shortcomings. A substantial amount of work related to functionality, governance framework, and initial operating model is now complete. This ongoing program, which leverages the CS' intraday forecasting program, includes key senior management from Treasury and Cash Management functions.

Further evolution of the operating model will continue after submitting this Plan, particularly in light of lessons learned from the COVID-19 pandemic. Like our RCEN metric, we calculate and report on our RLEN projections as part of our BAU activities related to resolution planning readiness.

## 4.3 Operational Readiness

CS has the capabilities to maintain its operational continuity throughout the execution of its preferred resolution strategy. To avoid disruptions during resolution and business unwind activities in the U.S, we have enabled CS entities to continue to access and maintain critical personnel, vendors, financial resources, Financial Market Utilities (FMUs), reporting, systems, and data to support timely decision-making.

CS has made significant investments in shared and outsourced services, payment, clearing, settlement, collateral management, and other related capabilities to facilitate operational continuity. While these capabilities support CS' ongoing BAU activities under normal business operations, they also help prepare CS for the unlikely occurrence of a resolution event.

## Payment, Clearing and Settlement (PCS) Activities

Our businesses and clients must have ongoing access to PCS providers during resolution to execute an orderly winddown of operations. As a result, enhancements to our capabilities related to continuity of access to PCS providers

#### Credit Suisse 2021 Resolution Plan

has and continues to be a top priority for CS. Our capabilities include the identification and prioritization of Key FMUs and Agent Banks utilizing value and volume data with a qualitative overview. We have transitioned most of our PCS Reporting activities to BAU and have further streamlined and enhanced our reporting and quantitative data gathering and mapping capabilities within a central repository for PCS Reporting purposes, the Payment, Clearing and Settlement Activity Reporting tool.

FMU access is closely linked to CS' liquidity forecasting framework. CS coordinates funding needs during BAU and stress globally and involves various CSH USA and Group functions that include Operations, Settlements, Cash Management, Global Treasury Money Markets, and Treasury Liquidity Planning. CS holds adequate liquidity buffers that would enable it to maintain continuity of access to PCS providers should there be a scenario which required additional liquid assets to meet increased requirements.

#### Exhibit 4.3-1: Key PCS Provider

Category	PCS Provider				
Agent Banks	The Bank of New York Mellon Corp.				
Central Security Depository (CSDs)	Depository Trust Company				
	Euroclear Bank S.A./N.V.				
Central Counterparty (CCPs)	Chicago Mercantile Exchange Inc.				
	Fixed Income Clearing Corporation				
	ICE Clear Credit LLC				
	LCH Limited				
	National Securities Clearing Corp.				
	Options Clearing Corporation				

In the U.S. Credit Suisse has a very limited role as a provider of PCS services and the majority of our clients will have contingency plans in case of service disruptions. Ensuring that our operating entities have continued FMU access is essential so that CS can continue executing cash, securities and derivative transactions for its clients and its businesses.

## Shared and Outsourced Services

Credit Suisse's enhancements to the continuity of shared and outsourced services considerably enhance the credibility of its SPOE strategy. As the U.S. MLEs wind-down in resolution, resolution-critical services will support the orderly liquidation of positions and movement of cash and securities, as well as governance and supervision of activities. Moreover, this operational continuity protects the broader financial markets from disruption during resolution.



Two critical pillars support the shared and outsourced component: First, the identification and mapping of critical services, and second, the U.S. Service Company. CS made several improvements based on feedback from the U.S. Agencies to our 2018 Plan on the first topic, including updating services mapping to include all the services supporting U.S. operations. As mentioned in our 2020 Plan, the refreshed mapping includes corporate (including those provided by entities in Poland and India) and front office functions.

In addition, we have refreshed the mapping of all critical services to the CSH USA's CBLs and COs. This mapping includes corporate as well as front office functions. A global attestation process is also now operational to validate these mappings by senior management and key stakeholders. Overall, we continue to enhance the transparency, robustness, and technology platform for hosting the mapping information on a long-term basis.

Our service entities are designed to provide flexible operational continuity capability during resolution. To that end, the U.S. Service Company is a key component of our operational resiliency. The service entity seeks to minimize the risk of discontinuity of critical shared services. Backed by a liquidity buffer equal to six months' working capital and a centrally-managed global master service agreement structure, U.S. Service Company now provides the vast bulk of resolution critical shared services, owns relevant IT, infrastructure, equipment, and employs back-and-middle office employees deemed essential to delivering resolution critical shared services (to the extent permitted by its regulators).

The U.S. Service Company is one of four global service companies (including Switzerland, the U.K, and Singapore) that house the bulk of cross-jurisdictional staff and resources deemed critical for group-wide resolution. Certain services needed for a U.S. wind-down are also provided by Poland and India-based Business Delivery Centers. For these services, CS has established inter-entity agreements and governance as part of its efforts to make sure that needed resources will be available and provided throughout the expected wind-down period.

We understand that operational resiliency is critical to an orderly wind down. We, therefore, continue to build on our existing local and global operational capabilities and keep our home and host regulators up-to-date on key developments as required.



## 5. Coronavirus Response

The COVID-19 pandemic caused unprecedented market disruption leading to a different operating environment for CS, its employees, clients, and stakeholders. The pandemic tested Credit Suisse's operational and financial capabilities, including those affecting resolvability preparedness. In response to the pandemic, CS invoked its formal crisis management process and put in place various response measures, including travel restrictions, a quarantine protocol, guidelines for client meetings and employee gatherings and certain changes to the daily operations of critical processes, in order to ensure continuity of its business operations and protect the health and safety of employees.

Throughout the pandemic, Credit Suisse increased the cadence of meetings of its senior management and governance forums to ensure appropriate governance, escalation, and decision-making during this period of stress. Credit Suisse was able to leverage its MIS, BAU reporting frameworks, and governance to respond to ad hoc and unique challenges resulting from the COVID-19 pandemic. Credit Suisse also engaged with and reported more frequently to its key regulators to navigate the challenges posed by the pandemic as efficiently as possible. Credit Suisse did not experience any discontinuity of shared, outsourced, or financial market utility services throughout the pandemic.

Credit Suisse performed lessons learned exercises and is using and will use the findings to enhance its resolution framework, including by amending the Americas contingency funding plan, and fine-tuning its crises response playbooks and reporting and escalation processes. Credit Suisse 2021 Resolution Plan



## 6. In Conclusion

We continue to challenge ourselves and strengthen the governance framework in resolution by strategically enhancing communication and decision-making processes, especially during periods of stress. As a result, we have a feasible and credible U.S. resolution strategy that allows for CS' U.S. operations to be resolved without adverse impacts on the U.S.'s financial stability or the broader global economy.

Moreover, the U.S. operations are also beginning to leverage a global resolution capability program to promote local resolution preparedness. Nevertheless, actual events rarely unfold as expected. Therefore, we have enhanced our planning processes to increase flexibility to deal with a wide array of adverse situations. As a result, the U.S. government or the FDIC's Deposit Insurance should not incur any losses if our Resolution Plan were to be implemented.

This limited public section articulates our commitment to enable Credit Suisse's U.S. operations to remain resolvable under multiple scenarios. It summarizes how we continue monitoring and refining our resolution capabilities, which are now embedded in BAU activities, as mentioned in the 2020 Plan. We expect to submit our next "full" Resolution Plan in 2024 to delineate our structural, financial, and operational capabilities to support our U.S. resolution strategy. In the meantime, we continue to work closely with the Agencies to monitor and strengthen our resolution capabilities.



# 7. Additional Resolution Planning Supporting Information

## **Derivatives and Hedging Activities**

Derivatives are financial instruments that acquire their value from underlying asset prices, reference rates, indices, and other inputs, or in some cases, a combination of these factors. These instruments are either publicly traded (exchange-traded) or privately negotiated contracts, sometimes referred to as over-the-counter (OTC) derivatives. OTC derivatives are cleared through central clearing counterparties, apart from the bi-lateral contracts.

As a global financial institution, CS has a sizable derivatives portfolio. We provide our clients with various services and products, including derivatives, to help them efficiently manage their risks as part of the ordinary course of business.

CS trades derivatives over the counter and on exchanges. CS' OTC derivative instruments are either third-party bilateral or third-party cleared. CS' third-party bilateral derivative activities include credit, equity, foreign exchange (FX) rate, interest rate, or other related products. CS' third-party cleared derivative activities are related to credit and other products. In addition, CS enters into inter-affiliate derivative transactions to establish positions across MLEs that manage risk based on our risk appetite. CS also transacts listed derivatives where transactions may include buying and selling futures and options contracts.

## **Hedging Activities**

CS' risk management practices include risk appetite frameworks utilized to determine the size and nature of risk limits (e.g., market risk limits) applied at the MLE and the line of business (LoB) levels. Per CS' risk limits, lines of business developed hedging strategies intended to effectively hedge derivatives and trading portfolios against various risk exposures and sensitivities that arise during the ordinary course of business.

In BAU, each line of business is responsible for monitoring risk exposures and appropriately applying its hedging strategy to mitigate against specific risk types with a variety of derivative products. In addition, in some instances, macro overlay hedges are also used to manage capital levels effectively. Overall, CS' hedging strategy is to effectively manage market risk on its derivatives and trading portfolios within its established risk appetite.

### **Booking Practices**

CS has an overarching booking model comprising policies, procedures, controls, and governance oversight that ensures that derivatives and other trades are booked in line with regulatory guidelines and established industry practices. In recent years, we have made several enhancements to our booking model practices.

Beginning in 2017, the CS *Global Booking Model Review* project, through a multi-stage approach, comprehensively documented our current state booking practices, established a set of global booking model principles, and assessed current rules and procedures by the material line of businesses. The project considered a range of factors that influence the utilization of booking entities, including infrastructure, market access, client requirements, risk management, and regulatory/licensing requirements.

These booking model enhancements are designed so that derivatives and other trades are booked in a manner that facilitates governance and controls and do not seriously impede the resolvability of our businesses.

## Management Information Systems

The importance of timely and reliable data from enterprisewide MIS is key to maintaining operational continuity, especially during periods of financial stress. Therefore, CS maintains a MIS that enables access to timely and reliable data to facilitate decision-making during and monitoring of CS' financial health, risks, and operations during resolution and business unwind activities. MIS capabilities cover a wide range of activities that are critical for identifying and assessing CS' financial health and risk positions throughout the stress continuum.

To determine criticality, CS considered BAU capabilities necessary to provide management with adequate information to make decisions and execute effectively during times of stress and resolution. The MIS Inventory and can be categorized into the following broad categories: Legal Entity Organization, Financial Adequacy, Risk, Legal Agreements, Operations, Support Services and Business Management. Overall, CS has and continues to prioritize MIS capabilities as a critical area of focus for planning objectives and has focused on building and enhancing the reporting capabilities to support MIS needs.



## **Collateral Management**

A strong liquidity management framework needs to be supported by a robust collateral management framework. Thus, CS monitors and enhances its collateral management capabilities to facilitate a successful resolution strategy, including improving its collateral policies, collateral forecasting framework, and business-specific asset traceability and reporting capabilities. In addition, we are also working on a long-term solution to develop a unified system that will provide a central view to facilitate timely collateral management and reporting (including sources and uses) for non-cash collateral across the CUSO entities.

## Liquidity and Funding Management

Credit Suisse continues to maintain a strong funding and liquidity position. The majority of our unsecured funding is generated from core customer deposits and long-term debt. Our liquidity and funding profile reflects our strategy and risk appetite and is driven by business activity levels and the overall operating environment. We have adapted our liquidity and funding profile to reflect lessons learned from the financial crisis, the subsequent changes in our business strategy and regulatory developments. Our 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 CS. We achieve this through a conservative asset/liability management strategy aimed at maintaining long-term funding, including stable deposits, in excess of illiquid assets.

To address short-term liquidity stress, we maintain a liquidity pool that covers unexpected outflows in the event of severe market and idiosyncratic stress. Our liquidity risk parameters reflect various liquidity stress assumptions that we believe are conservative. We manage our liquidity profile at a sufficient level such that, in the event we are unable to access unsecured funding, we expect to have sufficient liquidity to sustain operations for a period in excess of our minimum limit. This includes potential currency mismatches, which are not deemed to be a major risk but are monitored and subject to limits, particularly in the significant currencies of Euro, Japanese yen, pound sterling, Swiss franc and U.S. dollar.

Funding, liquidity, capital and our foreign exchange exposures are managed centrally by Treasury. Oversight of these activities is provided by the Credit Suisse Group Capital Allocation & Risk Management Committee, a committee that includes the Chief Executive Officers (CEOs) of the Group and the divisions, the CFO, the Chief Risk and Compliance Officers and the Treasurer.

## **Financial Interconnectedness**

Credit Suisse operates on a global funding model that allows for intra-group funding balances to exist between Credit Suisse entities. Funding and liquidity for each Credit Suisse entity are managed in accordance with Credit Suisse's Global Liquidity Risk Management Framework and the CFP. This framework is designed to maintain sufficient funds for the parent and its subsidiaries to meet their contractual and regulatory requirements during the ordinary course.

Under the global funding model, material entities have full access to the Group's global funding pool to meet funding requirements (including during the event of a stress scenario). This model enables Credit Suisse to meet the needs of its global client base while prudently managing its liquidity risk. Unsecured funding is raised by CS AG and Group and down-streamed to the various MLEs. Pursuant to the funding and liquidity analysis performed by Credit Suisse in preparation for its U.S. Plan, Credit Suisse has demonstrated that each MLE will have sufficient access to funding and liquidity in resolution.

## **Material Supervisory Authorities**

Various financial authorities regulate Credit Suisse's operations in each jurisdiction with offices, branches, and subsidiaries. Central banks and other bank regulators, financial services regulators, securities regulators and exchanges, and self-regulatory organizations are among the regulatory authorities that oversee the operation of CS' core business lines. In addition, material entities are overseen by a range of supervisory authorities based on the nature of the MLE's operations. In the U.S., supervisory authorities include:

*Federal Reserve Umbrella Supervision*: The FRB regulates CSH USA and its subsidiaries as the umbrella supervisor of Credit Suisse's U.S. operations.

*New York Branch (NYB) Regulation and Supervision*: NYB is licensed by the New York Superintendent of Financial Services, examined by the New York State Department of Financial Services, and subject to laws and regulations applicable to a foreign bank operating a New York branch. The NYB is also subject to examination by the FRB and is subject to federal banking law requirements and limitations on the acceptance and maintenance of deposits.

*Broker-Dealer Regulation and Supervision*: Our CSSU entity is regulated as a U.S. broker-dealer. The U.S. Securities and



Exchange Commission (SEC) is the federal agency primarily responsible for regulating broker-dealers, investment advisers, and investment companies. In addition, brokerdealers are subject to regulation by securities industry selfregulatory organizations, including the Financial Industry Regulatory Authority and state securities authorities. CSSU is also registered as a futures commission merchant and subject to the capital, segregation, and other requirements of the Commodity Futures Trading Commission (CFTC) and the National Futures Association. As a U.S. registered OTC derivatives dealer, CS Capital LLC is primarily regulated by the SEC and CFTC but is not a member of the Securities Investor Protection Corporation (SIPC).

The table below shows CS' Material Supervisory Authorities across the world.

## Exhibit 7-1: CS' Material Supervisory Authorities across the world

Supervisory authority	Jurisdiction
Swiss Financial Market Supervisory Authority (FINMA)	Switzerland
Federal Reserve Bank of New York (FRBNY)	United States
Federal Deposit Insurance Corporation (FDIC)	United States
US Securities and Exchange Commission (SEC)	United States
New York State Department of Financial Services	United States
Financial Industry Regulatory Authority (FINRA)	United States
US Commodity Futures Trading Commission (CFTC)	United States
New York Stock Exchange (NYSE)	United States
National Futures Association	United States
UK Prudential Regulation Authority (PRA)	United Kingdom
UK Financial Conduct Authority (FCA)	United Kingdom
Australian Securities and Investments Commission (ASIC)	Australian
Securities Commission of the Bahamas	Bahamas
Central Bank of the Bahamas	Bahamas
Cayman Islands Monetary Authority (CIMA)	Cayman Islands
Hong Kong Securities and Futures Commission (SFC)	China
Hong Kong Monetary Authority (HKMA)	China
China Banking Regulatory Commission (CBRC)	China
China Securities Regulatory Commission (CSRC)	China
Guernsey Financial Services Commission	Guernsey
Software Technology Parks of India	India
India Department of Telecommunication	India
India Development Commissioner, Special Economic Zone	India
Japan Financial Services Agency (FSA)	Japan
Monetary Authority of Singapore (MAS)	Singapore
Singapore Exchange Limited	Singapore

## **Principal Officers**

Set forth below are the members of our U.S. Executive committee as of October, 2021.

*Chair* Eric Varvel President and CEO, CSH USA

*Members* Jay Kim IB, Securitized Products and Credit

David Miller IB, Head of Capital Markets & Advisory

Michael Levin AM, Asset Management Americas

Rob Basso HR, CSH USA, and IB

Jim Barkley CRCO, CUSO CIB and IB CCO

David Krauss CRCO, CUSO CIB CRO, Head of Global Market Risk

Nomita Singh CSH USA, COO

Radhika Venkatraman IB, CRCO Technology, Data, and Infrastructure

Frank D'Alessio CFO, CSH USA

Crystal Lalime GC, CSH USA, and IB

Thomas Harrop CFO, Treasury CSH USA

Darren Malcolm COO, New Business

Patrick Remmert CS AG, NY and CI Branch Manager

Dan Johnson CS AG, Internal Audit



Set forth below are the CSH USA Board members as of October, 2021.

Bruce Richards, Chair

Hilary Ackermann

Jerry Leamon

Morris Applewhite

Eric Varvel

David Miller

Jay Kim

Joachim Oechslin

Set forth below are the Credit Suisse Group AG Board members as of October, 2021.

António Horta-Osório

Iris Bohnet

Clare Brady

Juan Colombas

Christian Gellerstad

Michael Klein

Axel Lehmann

Shan Li

Seraina Macia

Blythe Masters

Richard Meddings

Kai S. Nargolwala

Ana Paula Pessoa

Severin Schwan

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Set forth below are the Credit Suisse Executive Board as of October, 2021.

Thomas Gottstein Chief Executive Officer

André Helfenstein CEO Swiss Universal Bank und CEO Credit Suisse (Schweiz) AG

Ulrich Körner CEO Asset Management

Christian Meissner CEO Investment Bank

Helman Sitohang CEO Asia Pacific

Philipp Wehle CEO International Wealth Management

Romeo Cerutti General Counsel

Lydie Hudson CEO Sustainability, Research & Investment Solutions

Rafael Lopez Lorenzo Chief Compliance Officer

David Mathers Chief Financial Officer

Joachim Oechslin Chief Risk Officer (ad interim)

Antoinette Poschung Global Head of Human Resources

James B. Walker Chief Operating Officer



## **Key Financial Metrics**

On July 29, 2021, Credit Suisse Group presented its second-quarter 2021 financial results to investors, analysts, and media. A summary of key financial metrics is shown below. Additional financial information, annual reports, and other key documents are available on the Credit Suisse investor relations website.

## Exhibit 7-2: Key Financial Metrics

Key metrics

	in / end of			% change		in / end of		% change
	2021	1021	2020	QoQ	YoY	6M21	6M20	Yo
Credit Suisse (CHF million)								
Net revenues	5,103	7,574	6,194	(33)	(18)	12,677	11,970	6
Provision for credit losses	(25)	4,394	296	-	-	4,369	864	406
Total operating expenses	4,315	3,937	4,347	10	(1)	8,252	8,354	(1
Income/(loss) before taxes	813	(757)	1,551	-	(48)	56	2,752	(98
Net income/(loss) attributable to shareholders	253	(252)	1,162	121	(78)	1	2,476	(100
Cost/income ratio (%)	84.6	52.0	70.2	-	-	65.1	69.8	-
Effective tax rate (%)	69.6	69.5	25.2	-		71.4	10.2	-
Basic earnings/(loss) per share (CHF)	0.10	(0.10)	0.47	-	(79)	0.00	1.00	(100
Diluted earnings/(loss) per share (CHF)	0.10	(0.10)	0.46	-	(78)	0.00	0.98	(100
Return on equity (%)	2.3	(2.3)	9.8	-	-	0.0	10.7	-
Return on tangible equity (%)	2.6	(2.6)	11.0	-	17	0.0	12.0	
Assets under management and net new assets (CHF	billion)							
Assets under management	1,632.0	1,596.0	1,443.4	2.3	13.1	1,632.0	1,443.4	13.1
Net new assets	(4.7)	28.4	9.8	-	-	23.7	15.6	51.9
Balance sheet statistics (CHF million)								
Total assets	796,799	851.395	828,480	(6)	(4)	796,799	828.480	(4
Net loans	299,844	304,188	294,312	(1)	2	299,844	294,312	
Total shareholders' equity	43.580	44,590	46.535	(2)	(6)	43,580	46.535	(6
Tangible shareholders' equity	38,747	39,707	41,586	(2)	(7)	38,747	41,586	(7
Basel III regulatory capital and leverage statistics (%	.)							
CET1 ratio	13.7	12.2	12.5	-	2	13.7	12.5	
CET1 leverage ratio	4.2	3.8	4.5		12	4.2	4.5	
Tier 1 leverage ratio	6.0	5.5	6.2	-	-	6.0	6.2	
Share information								
Shares outstanding (million)	2,411.3	2,364.0	2,441.6	2	(1)	2,411.3	2,441.6	(1
of which common shares issued	2.650.7	2.447.7	2.556.0	8	4	2.650.7	2.556.0	
of which treasury shares	(239.4)	(83.7)	(114.4)	186	109	(239.4)	(114.4)	10
Book value per share (CHF)	18.07	18.86	19.06	(4)	(5)	18.07	19.06	(5
Tangible book value per share (CHF)	16.07	16.80	17.03	(4)	(6)	16.07	17.03	(6
Market capitalization (CHF million)	25,448	24,009	23,983	6	6	25,448	23,983	6
Number of employees (full-time equivalents)								
Number of employees	49.240	49.090	48.800	0	1	49.240	48.800	

## **U.S. Material Legal Entities**

**Credit Suisse Holdings (USA), Inc.**: CSH USA is a U.S. based holding company and a Delaware corporation. As a holding company, CSH USA does not interact with the external market in any significant manner. CSH USA is not subject to standalone regulatory capital requirements. As a parent holding company, CSH USA does not employ any staff and is reliant on staff in other entities.

The largest FBOs operating in the United States - such as CS - are required to consolidate U.S. legal entity ownership interests under a single, top-tier IHC. As of July 1, 2016, CSH USA was designated as Credit Suisse's IHC. CSH USA is the top-tier entity for CS U.S.-domiciled subsidiaries required to be held by it. The U.S. BoD was established on April 1, 2016. As the holding company for U.S. subsidiaries, CSH USA does not directly interact with the CBLs. In addition, no COs are specifically booked into CSH USA.

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**Credit Suisse (USA), Inc.:** CS USA is a U.S.-based holding company and a Delaware corporation. CS USA is wholly owned by CSH USA. CS USA directly owns a number of subsidiaries including the following MLEs: CSSU, CS Mgmt LLC and Credit Suisse Capital Holdings, Inc. which owns the MLE, CS Capital LLC.

CS USA primarily has subordinated lending to broker dealers (CSSU and CS Capital LLC) and also invests in its core subsidiaries. CS USA also provides guarantees to its core subsidiaries, which offer assurances to the counterparties as they interact with external third parties. CS USA receives all of its unsecured funding from the centralized funding model operated by CS AG, now flowing through CSH USA. CS USA previously issued debt, which is publicly traded and is managed through transactions with CS affiliates. CS USA is not subject to standalone regulatory capital requirements. There are no CBLs originated or booked into CS USA, as it is primarily used as a holding company for U.S. subsidiaries.

**Credit Suisse Securities (USA) LLC**: CSSU is a whollyowned subsidiary of CS USA and an indirect wholly-owned subsidiary of CSH USA whose ultimate parent is CSG AG. CSSU is a Delaware limited liability company and a U.S. broker-dealer registered with the Securities and Exchange Commission (SEC). Its principal business is its investment banking and capital markets and global markets business lines, including a variety of capital raising, market making, advisory and brokerage services for governments, financial institutions, high-net-worth individuals, corporate clients and affiliates. CSSU is also an underwriter, placement agent and dealer for money market instruments, commercial paper, mortgage and other asset-backed securities, as well as a range of debt, equity and other convertible securities of corporations and other issuers.

CSSU, as a registered broker-dealer, is regulated primarily by the SEC and 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. CSSU is also subject to the SEC's customer protection rule, which requires broker dealers to segregate cash and / or securities to protect customer assets. Additional CSSU regulators include: Commodities Futures Trading Commission (CFTC) (given CSSU is a designated Futures Commission Merchant (FCM)), FINRA, and the Federal Reserve Bank of New York (FRBNY). There are a number of CBLs that book transactions into CSSU.

**Credit Suisse Capital LLC**: CS Capital LLC is a whollyowned subsidiary of CS Capital Holdings, Inc., which is a wholly-owned subsidiary of



CS USA and an indirect wholly-owned subsidiary of CSH USA, whose ultimate parent is CSG AG. CS Capital LLC is a U.S. broker-dealer registered with the SEC as an OTC derivatives dealer and a Delaware limited liability company. In addition, CS Capital LLC also operates as a registered swap dealer with the CFTC, effective August 2017. An OTC derivatives dealer is a special category of broker-dealer engaged in an OTC derivatives business.

As an OTC derivatives dealer, CS Capital LLC does not carry securities accounts for customers and therefore is exempt from the provisions of the SEC's customer protection rule. CS Capital LLC is subject to Appendix F of the SEC's net capital rule (15c3-1), which requires broker dealers to maintain a specified level of minimum net capital in relatively liquid form. CS Capital LLC is not required to be and is not a member of any self-regulatory organization or exchange and is not a member of the Securities Investor Protection Corporation (SIPC). A few investment banking CBLs are booked into this entity.

## Exhibit 7-3: U.S. MLEs



**Credit Suisse Management LLC:** CS Mgmt LLC is a Delaware limited liability company based in the United States. CS Mgmt LLC is a wholly-owned subsidiary of CS USA and an indirect wholly-owned subsidiary of CSH USA whose ultimate parent is CSG AG.

The primary purpose of CS Mgmt LLC is to carry out derivative transactions to hedge positions of U.S. affiliates,

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primarily with other CS affiliates. CS Mgmt LLC is not subject to standalone regulatory capital requirements. The CBLs that book into CS Mgmt LLC include Securitized Products (SP), Credit Products and Prime Services (PS).

These bookings are primarily related to hedging activities. Although derivative are booked into CS Mgmt LLC, the staff and systems used to clear and settle these transactions reside in CSSU, U.S. Service Co., CSSEL and CSi. Therefore, we do not define CS Mgmt LLC as operating any COs. For these activities, key resources such as staff are legally tied to CSSU which creates an interdependency between U.S. Service Co., CS Mgmt LLC and CSSU.

**Credit Suisse Services (USA) LLC:** U.S. Service Co. was formed as the U.S. service company in 2016, an independent subsidiary and MLE within the CSH USA entity structure. The U.S. Service Co. has its own governance and has an established liquidity buffer to ensure provision of effective and continuous support and operability through the orderly wind down of Credit Suisse operations.

The U.S. Service Co. has a Board of Managers that supervises the entity's activities and financial and operational readiness, and U.S. Service Co. key officers (e.g. CFO, COO, Treasurer) have been assigned.

The U.S. Service Co. is one of four service companies globally (including Switzerland, UK, and Singapore) that house the majority of cross-jurisdictional staff and resources deemed critical for Credit Suisse Group-wide resolution. Together with Poland and India-based Business Delivery Centers, some resolution-critical services needed to support the U.S. wind-down plans are provided by these entities to ensure that needed resources will be available and provided throughout the expected wind-down period.

There is no CBL and CO activity originated or booked into U.S. Service Co. as it is exclusively used as a servicing company for U.S. entities.

**CS AG, New York Branch:** is a branch of CS AG and therefore part of the legal entity CS AG. NYB is a clientfacing entity and as such serves a number of important corporate functions for the bank. NYB lends to Ultra High Net Worth clients (principally "non-purpose lending"), and to corporate clients.

Since November 2017, NYB is Credit Suisse's FRBNY Primary Dealer. As such, NYB is a market maker in U.S. government and agency securities, facilitates HQLA sourcing for affiliates, offers client financing via repos and offers



secondary trading of residential mortgage-backed securities guaranteed by U.S. Government Sponsored Entities. It is one [of] CS' vehicles for accessing unsecured short-term funding in the United States via the issuance of Certificates of Deposit and Commercial Paper, as well as the Federal Reserve Discount Window lending.

NYB is licensed by the New York State Department of Financial Services (NYDFS) subject to laws and regulations applicable to a foreign bank operating a New York branch and, as such, is supervised and examined by the NYDFS.

Under the New York Banking Law, NYB is required to maintain a certain amount of eligible assets with banks in the State of New York. CS AG is a fully owned subsidiary of CSG AG, the holding company. NYB carries CS AG's external credit ratings.