PRACTICAL LAW COMPANY®

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Standard vs. Tailored Plan Option – Non-U.S. Financial Groups*

DFA Plans:

- 1. Executive Summary (required for all plans not entity specific)
- 2. Strategic Analysis of Plan Components
- 3. Description of Corporate Governance Structure
- 4. Description of Organizational Structure
- 5. Description of Management Information Systems
- 6. Descriptions of Interconnections and Interdependencies with Material Entities
- 7. Supervisory and Regulatory Information
- 8. Contact Information
- 9. Integration of U.S. Plan into Global Plan (required for all plans not entity specific)

Standard Plan

Standard Plan

Top Tier Hold Co.

Components 2-8

U.S. Non-Banking Operations

Subject to Bankruptcy Code

Components 2-8

Subject to Special Insolvency Regime

Components 3-8 and 2 (to a limited extent, unless assets of \$50+ billion/Critical Operation)

U.S. IDI (Banking) Operations

Over \$50 Billion

Components 2-8

Less than \$50 Billion

Components 3-8 and 2 (to a limited extent, unless Critical Operation)

Non-U.S. Operations

Banking (office of an IDI) and

Non-Banking

Components 3-8 and 2 (to a limited extent, unless assets of \$50+ billion/Critical Operation)

Tailored Plan

Top Tier Hold Co.

Components 2-8

U.S. Non-Banking Operations

Subject to Bankruptcy Code

Components 2-8

Subject to Special Insolvency Regime

Components 3-8 and 2 (to a limited extent, unless assets of \$50+ billion/Critical Operation)

U.S. IDI (Banking) Operations

Over \$50 Billion

Components 6 and 8

Less than \$50 Billion

Components 6 and 8

Non-U.S. Operations

Banking (office of an IDI)

Components 6 and 8

Non-Banking

Components 3-8 and 2 (to a limited extent, unless assets of \$50+ billion/Critical Operation)

^{*} Required plan components apply to Material Entities of the financial group.