

Katten

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EXHIBIT 4		Applicability of Entity-Level Requirements to Non-US Persons Registered as SDs and MSPs (Based on Type of Counterparty)		
Category	Entity-Level Requirement	US Person (Including a Non-US Branch of the US Person)	Non-US Person	
Type of Category				
First	Capital Adequacy	Applicable (substituted compliance permitted, if available)	Applicable (substituted compliance permitted, if available)	
First	Chief Compliance Officer	Applicable (substituted compliance permitted, if available)	Applicable (substituted compliance permitted, if available)	
First	Risk Management	Applicable (substituted compliance permitted, if available)	Applicable (substituted compliance permitted, if available)	
First	Swap Recordkeeping (except for Customer Complaints and Marketing Materials)	Applicable (substituted compliance permitted, if available)	Applicable (substituted compliance permitted, if available)	
Second	Swap Data Repository Reporting	Applicable	Applicable (substituted compliance permitted, if available, but only if CFTC has access to foreign SDR data)	
Second	Swap Recordkeeping for Customer Complaints and Marketing Materials	Applicable	Applicable (substituted compliance permitted, if available)	
Second	Large Trader Reporting	Applicable	Applicable	