Bank of England

Prudential Regulation Authority

CRR Permission 352(2) supplementary application form

Calculation of the overall net foreign exchange position

Guidance on completion of template:

The template must be completed, together with the CRR permission application form, by a firm applying for Article 352(2) permission. The second column should be used to indicate whether the minimum standard is met. All standards must be met before permission will be granted. The third column requires a brief description of how the minimum standard is met.

Application Details		
	Signature	
Attestation by a Senior Management		
Function (SMF) of compliance with the		
relevant CRR requirements.		
Item	Summary Information	
Descriptions of the positions requested to		
be excluded		

Factors demonstrating that the CRR Standard is met			
CRR Standard	Meets Standard? (Yes/No)	FIRM ANALYSIS Please demonstrate using examples where appropriate how the minimum standards are met.	
Structural FX positions are deliberately taken in order to protect capital adequacy ratios against adverse movements in FX rates.			
Positions are of a non- trading or structural nature.			
Mismatches resulting in an			

	Y	
open position are avoided as far as possible.		
Positions are accounted for		
so that capital ratios are		
protected.		
Any residual risks arising		
from structural FX positions		
are considered and		
capitalised in the Pillar 2		
assessment of the firm.		
Any residual risks arising		
from structural FX positions		
are avoided as far as		
possible.		
Policies and procedures		
are clearly articulated and		
are made available to the		
board and to regulators on		
an annual basis.		
The structural FX hedging		
strategy is clearly		
articulated to investors and		
is included in Pillar 3		
disclosures.		
Books containing structural		
FX positions are		
segregated from other		
trading activities.		
Traders' remuneration		
structures do not in any way incentivise structural		
FX positions becoming a		
profit centre.		
Oversight of structural FX		
positions is carried out by		
the appropriate committees		
of the boards of both the		
foreign entity and the group		
on at least a quarterly		
basis.		
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March 2023