



EU interim compliance report by ASIC

ASIC's interim report dated **7 June 2018** on compliance with the s93AA ASIC Act enforceable undertaking given by **Barclays Capital Inc (BCI), Barclays Capital Asia Limited (BCAL) and Barclays Capital Securities Limited (BCSL)** (together "**Barclays Entities**") dated 22 March 2017.

Terms used in this report have the same meaning as in the 22 March 2017 enforceable undertaking (**EU**).

Undertakings	Report on compliance
<p>Contribution to The Ethics Centre</p> <p>EU paragraph 6.2</p>	<p>1. On 18 April 2017, the Barclays Entities made payments to the total amount of A\$500,000 to The Ethics Centre in accordance with the requirements and time frame specified in the EU.</p>
<p>Independent Expert</p> <p>EU paragraphs 6.3 - 6.7</p>	<p>2. Ernst & Young (EY) was appointed on 19 July 2017, with ASIC's approval, as the Independent Expert (IE) in accordance with the terms of engagement and time frame specified in the EU.</p>
<p>First Review</p> <p>Paragraph 6.8(a) of the EU</p>	<p>3. The First Review was conducted by the IE in accordance with the requirements and time frame specified in the EU.</p>
<p>First Report</p> <p>Paragraphs 6.8(b) and 6.9 of the EU</p>	<p>4. The First Report was delivered in accordance with the requirements and time frame specified in the EU.</p> <p>5. The First Report set out the IE's findings from the First Review. In summary, the IE found:</p> <ul style="list-style-type: none"> • no weaknesses (Deficiencies) in compliance by the Barclays Entities with the Disclosure Requirement and for BCI, the Reporting Requirement, since the date of the EU; and • that the policies, procedures, practices, training and monitoring arrangements put in place by the Barclays Entities had been sufficiently designed to ensure effective and enduring compliance with the Disclosure Requirement and for BCI, the Reporting

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	<p data-bbox="767 264 1222 331">Requirement, as at the point in time at which the IE's assessment was made.</p> <p data-bbox="692 353 1286 539">The IE identified two potential improvement opportunities to further enhance the Barclays Entities' control environment, however the IE did not believe those improvement opportunities were reflective of compliance Deficiencies.</p>
<p data-bbox="220 577 568 611">First Remedial Action Plan</p> <p data-bbox="220 645 544 678">EU paragraphs 6.10 – 6.14</p>	<p data-bbox="651 577 1270 801">6. A First Remedial Action Plan is not required as the findings of the First Review did not identify any weaknesses (Deficiencies) in compliance by the Barclays Entities with the Disclosure Requirement, and for BCI, the Reporting Requirement, since the date of the EU.</p>