

Appendix B: Operating Subsidiary Activities Eligible for the New Notice Provisions (Procedures Rule)¹⁵

| Investments and securities | Lending | Insurance | Tax & transactional advice | Services to the bank ¹⁶ | Other activities |
|---|--|---|--|--|--|
| Acting as investment adviser (including with investment discretion) or financial adviser or counselor to governmental entities or instrumentalities, businesses, or individuals | Making loans or other extensions of credit, and selling money orders, savings bonds, and travelers checks | Acting as an insurance agent or broker, including title insurance to the extent permitted under section 303 of the Gramm-Leach-Bliley Act | Providing tax planning and preparation services | Holding and managing assets acquired by the parent bank or its operating subsidiaries, including investment assets and property acquired by the bank through, e.g., foreclosure or in the ordinary course of collecting a debt previously contracted | Leasing of personal property and acting as an agent or adviser in leases for others |
| Providing securities brokerage or acting as a futures commission merchant, and providing related credit and other related services | Purchasing, selling, servicing, or warehousing loans or other extensions of credit, or interests therein | Reinsuring mortgage insurance on loans originated, purchased, or serviced by the bank, its subsidiaries, or its affiliates (special rules apply for subsidiary quota share agreements) | Providing financial and transactional advice and assistance, e.g., structuring, arranging, and executing mergers and acquisitions, divestitures, joint ventures, leveraged buyouts, swaps, foreign exchange, derivative transactions, coin and bullion, and capital restructurings | Providing services to or for the bank or its affiliates, including accounting, auditing, appraising, advertising and public relations, and financial advice and consulting | Providing merchant processing services (except when the activity involves the use of third parties to solicit or underwrite merchants) |
| Underwriting and dealing, including making a market, in bank permissible securities and purchasing and selling as principal, asset backed obligations | Underwriting and reinsuring credit related insurance to the extent permitted under section 302 of the Gramm-Leach-Bliley Act | | Acting as a finder pursuant to 12 CFR 7.1002 to the extent permitted by published OCC precedent for national banks | Providing data processing, warehousing, and transmission products, services, and related activities and facilities | Offering debt cancellation or debt suspension agreements |
| Acting as agent or broker in the sale of fixed or variable annuities | | | Acting as a transfer or fiscal agent | Offering correspondent services | Acting as a digital certification authority |
| | | | | Providing data processing, and data transmission services, facilities | Providing or selling public transportation tickets, event and attraction tickets, |

¹⁵ Generally these activities are permitted to the extent permitted for national banks in OCC precedent.

¹⁶ Or other financial institutions, as applicable.

| Investments and securities | Lending | Insurance | Tax & transactional advice | Services to the bank ¹⁶ | Other activities |
|----------------------------|---------|-----------|----------------------------|--|--|
| | | | | (including equipment, technology, and personnel), databases, advice and access to such services, facilities, databases and advice, for the parent bank and for others, pursuant to 12 CFR 7.5006 | gift certificates, prepaid phone cards, promotional/advertising material, postage stamps, EBT script, and similar media |
| | | | | Providing management consulting, operational advice, and services for other financial institutions | Providing bill presentment, billing, collection, and claims-processing services |
| | | | | Providing real estate settlement, closing, escrow, and related services; and real estate appraisal services for the subsidiary, parent bank, or other financial institutions | Providing safekeeping for personal information or valuable confidential trade or business information, such as encryption keys |
| | | | | Providing branch management services | Providing payroll processing |
| | | | | Providing courier services between financial institutions | Providing check guaranty, verification and payment services |
| | | | | | Performing administrative tasks involved in benefits administration |