

Attachment A
List of Factors Addressed in a Bank's Request

The rule provides that the Board may extend the seeding period for up to two additional years if the Board finds that an extension would be consistent with safety and soundness and not detrimental to the public interest. In reviewing any application, the Board may consider all the facts and circumstances related to the permitted investment in a covered fund, including:

- (i) Whether the investment would result, directly or indirectly, in a material exposure by the banking entity to high-risk assets or high-risk trading strategies;
- (ii) The contractual terms governing the banking entity's interest in the covered fund;
- (iii) The date on which the covered fund is expected to have attracted sufficient investments from investors unaffiliated with the banking entity to enable the banking entity to comply with the limitations in section __.12(a)(2)(i) of the final rule;
- (iv) The total exposure of the covered banking entity to the investment and the risks that disposing of, or maintaining, the investment in the covered fund may pose to the banking entity and the financial stability of the United States;
- (v) The cost to the banking entity of divesting or disposing of the investment within the applicable period;
- (vi) Whether the investment or the divestiture or conformance of the investment would involve or result in a material conflict of interest between the banking entity and unaffiliated parties, including clients, customers or counterparties to which it owes a duty;
- (vii) The banking entity's prior efforts to reduce through redemption, sale, dilution, or other methods its ownership interests in the covered fund, including activities related to the marketing of interests in such covered fund;
- (viii) Market conditions; and
- (ix) Any other factor that the Board believes appropriate.