

**BOCNY Procedure for Using HO Securities**

**纽约分行使用总行债券的操作流程**

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Contents

[1. Executive Summary (执行摘要) 4](#_Toc12433950)

[1.1. Rationale (管理操作目标) 4](#_Toc12433951)

[1.2. Related Policies & Procedures (相关政策流程) 4](#_Toc12433952)

[2. Scope (适用范围) 4](#_Toc12433953)

[3. Roles & Responsibilities (职责分工) 4](#_Toc12433954)

[3.1. Procedure Governance (办法管理) 4](#_Toc12433955)

[3.2. Procedure Implementation (办法实施) 5](#_Toc12433956)

[4. Procedure Instructions (流程内容) 6](#_Toc12433957)

[5. Assurance Methods (办法实施监督) 10](#_Toc12433958)

[5.1. Awareness Methods (办法颁布) 10](#_Toc12433959)

[5.2. Adherence Monitoring (办法遵循监测) 10](#_Toc12433960)

[5.3. Update Requirements (定期更新) 10](#_Toc12433961)

[5.4. Consequences of Violation (违规后果) 10](#_Toc12433962)

[6. 参考资料Reference Information 11](#_Toc12433963)

[6.1. Glossary (缩略语) 11](#_Toc12433964)

[7. 附录Appendix 11](#_Toc12433965)

1. Executive Summary (执行摘要)
   1. Rationale (管理操作目标)

This procedure is to cover the BOCNY departments’ operations that are unique for using HO securities for overnight REPO or as pledge for FRB Discount Window borrowing.

本流程是用于管理纽约分行使用总行债券叙做隔夜回购交易和使用总行债券作为押品从联储贴现窗口借款时的各部门职责分工和总体流程。

* 1. Related Policies & Procedures (相关政策流程)

Related procedures are as follows: 1) BOCNY Intraday Liquidity Management Procedure (TRY); 2) Global Market and Treasury Business Procedure (MKD); 3) Operation Service Department Treasury Back Office Procedures (OSD); 4) Operation Service Department Custody Service Operating Procedures (OSD); 5) BOCNY Contingency Funding Plan

相关流程包括：1） 中国银行纽约分行日间流动性管理操作流程；2）全球市场和资金业务操作流程；3）运营服务部资金后台操作流程；4）运营服务部托管操作流程; 5） 纽约分行流动性应急预案

1. Scope (适用范围)

The scope of this procedure applies to TRY, MKD and OSD.

本流程涉及的部门有司库，金融市场部和运营服务部。

1. Roles & Responsibilities (职责分工)
   1. Procedure Governance (办法管理)

The Procedure is drafted by TRY. The EVP-in-charge is the executive approval authority. TRY is the owner of this Procedure.

本操作流程由司库起草，并由其分管行领导审批。司库是本操作流程的管理部门。

The Procedure should be periodically reviewed at least once a year to reflect any changes in the related policies and processes.

本操作流程必须定期重检（至少每年一次）, 以反映相关政策流程等的变化。

* 1. Procedure Implementation (办法实施)

TRY, MKD and OSD will work together based on this procedure and their own operating procedures. The following are roles and responsibilities for each department.

司库，金融市场部和运营服务部将根据本流程以及其内部流程进行操作，以下是三部门的职责分工。

TRY will calculate and predict the EOD FRB balance, and work together with MKD to report to HO and/or EVP-in charge. MKD will make actual executions. In addition, for pledge purposes, TRY and MKD will work together to provide instructions to OSD. OSD will process settlement (including repo settlement or FRB U102 account movement).

司库负责日终联储余额匡算, 并会同金融市场部向总行和纽行分管行领导汇报。金融市场部负责市场执行。此外，使用总行债券作为押品从联储贴现窗口借款时，给运营服务部的调券指令，由司库会同金融市场部共同拟定。运营服务部负责结算（包含repo结算或联储质押户的调券操作）。

1. Procedure Instructions (流程内容)
   1. Using HO securities for overnight REPO (使用总行债券叙做隔夜回购交易)
2. NYB-TRY estimates the end-of-day Federal Reserve balance in the morning of each business day, and predicts the nature (liquidity shortfall or regulatory compliance gap) and severity of the funding gap.

纽约分行司库于每日早上对当日日终联储余额进行匡算，并对资金缺口的性质（实质流动性资金缺口或是监管指标缺口）和严重程度进行预判。

1. NYB will actively make up the funding gap by all means necessary, including borrowing in overseas market (Eurodollar or non-USD currencies followed by swap to USD) and local market, issuing short-term Yankee CDs, etc.

出现资金缺口预判时，纽约分行将积极调动一切手段填补资金缺口，包括从境外市场融入资金（欧元或其他币种的资金然后掉期成美元）、当地市场拆借、发行超短期限的扬基存单等。

1. Since the U.S. repo market liquidity is better in the morning and then gradually deteriorates, NYB TRY and MKD will work closely together to choose an appropriate time to execute repo transactions in order to close the funding gap. If there still remains a large funding shortfall after exhausting all means, then NYB will promptly initiate repo transactions using Head Office securities. However, if the funding shortfall is relatively small, NYB may wait until 10:00 a.m. to determine the necessity of making repo transactions according to an updated estimate of liquidity situation. Considering the Federal Reserve securities DVP settlement cut-off time is 3:00 p.m., NYB-MKD is should deliver all trading confirmations to NYB-OSD by 12:00 p.m.

由于回购市场的流动性在早间较好，随着时间的推移逐渐变差。纽约分行司库会同金融市场部视资金缺口的弥补情况选择何时进行隔夜回购交易时：若截至早9点用尽一切手段仍然离完全弥补缺口有很大差距，则应立即动用总行债券进行隔夜回购交易；若缺口较小，则可等到10点左右根据更新的流动性测算再判断是否进行隔夜回购交易。考虑到联储债券结算的截止时间为下午3点，原则上12点前，纽约分行金融市场部必须把全部交易单传递到运营服务部。

1. NYB TRY and MKD are required to report to their EVP-in-charge before executing repo transactions and send notice to Head Office Treasury Department and Head Office Global Markets Department.

交易前需报请纽约分行司库和金融市场部的分管行领导批准，并报备总行司库以及全球市场部。

1. NYB-TRY shall inform NYB-OSD promptly once it is decided to execute repo transactions using Head Office securities.

决定使用总行债券叙做隔夜回购后，纽约分行司库将尽快通知运营服务部做好准备。

1. When executing overnight repo transactions, NYB-MKD selects Head Office securities in the following order: ① U.S. Treasuries, ② security whose interest payment date does not fall into the duration of repo transaction, ③ relatively large inventory of that particular security. In addition, market demand of the security can also be taken into consideration.

纽约分行金融市场部使用总行债券叙做隔夜回购时选择债券应遵循以下原则：①美国国债；②付息日在回购交易存续期之外; ③该支债券存量较大。此外，市场对债券的需求也可酌情考虑。

1. Overnight repo transactions using Head Office securities consist of the following three parts: Repo transaction between New York Branch and external counterparties (New York Branch lends securities and takes cash); Repo transactions between New York Branch and Head Office (New York Branch borrows securities and gives cash); Interbank borrowing/lending between New York Branch and Head Office (NYB borrowing USD from HO). Repo transaction terms between New York Branch and Head Office are based on the repo transactions with external counterparties: all transaction terms should be the same except in the opposite direction. The transaction terms of the NYB USD borrowing transaction from Head Office is based on the underlying overnight repo transaction: Head Office lending amount equals to the sum of wired amount with same repo rate; lending rate equals to repo rate; value date and maturity date for lending transactions are consistent with those of repo transactions.

使用总行债券叙做隔夜回购时，纽约分行金融市场部将按照内部流程执行由以下三部分组成的交易：纽行与外部交易对手的债券隔夜回购交易（方向为纽约分行融出债券融入美元资金），纽行与总行的债券隔夜逆回购交易（方向为纽约分行融入债券融出美元资金），纽行与总行的美元资金隔夜拆借交易。根据与外部交易对手叙做的隔夜回购交易，与总行叙做隔夜逆回购交易：除交易方向相反外，其他交易细节均应一致。根据上述回购交易叙做与总行的美元资金拆借交易，交易细节应为：拆借交易金额等于同一回购利率的期初结算金额的加总、拆借交易利率与回购利率一致、拆借交易起息日和到期日与回购交易一致。

1. NYB-OSD settles transactions according to its internal procedures after NYB-MKD completes execution.

在纽约分行金融市场部执行交易后，运营服务部按照其内部流程完成结算工作。

1. NYB-MKD reports to Head Office Treasury Department Liquidity Management Team and Global Markets Department Foreign Currency Liquidity Team through Notes regarding repo transactions on the day, and requests Head Office settlement instructions accordingly. The following details of repo transactions must be included in the report: counterparty, security code, principal amount, value date, maturity date, repo date, wired amount and termination money. The following details of NYB USD borrowing transactions from Head Office must be included in the report: counterparty (Head Office), principal amount, value date, maturity date and interest rate.

纽约分行金融市场部在下班前通过Notes将当日叙做的上述交易细节逐笔向总行司库流动性团队和全球市场部外币流动性团队进行汇报，并请总行补发相应结算指令给纽行。纽行汇报的回购交易细节应包括对手行、债券代码、本金金额、起息日、到期日和期初结算金额。拆借交易细节应包括对手行（即总行）、金额、起息日、到期日和拆借利率。

1. NYB TRD and MKD will report to their EVP-in-charge regarding the repo transactions by the end of the day.

纽约分行司库将会同金融市场部将所有交易执行情况在日终前向纽行分管行领导汇报。

* 1. Using HO securities as pledge for FRB Discount Window borrowing (使用总行债券作为押品从联储贴现窗口借款)

1. If NYB-TRY still predicts that the end-of-day Federal Reserve balance will have a gap after 12:00pm EST, and if NYB-MKD has already implemented all means necessary for obtaining funding but still isn’t able to cover the predicted funding gap (this shall include using head office securities to conduct overnight repo. The New York branch shall try using Head office securities to do repo to raise funds before considering FRB pledge. Only under marketing condition when NYB cannot conduct overnight repo, shall NYB consider using Head Office Securities to borrow from FRB Discount Window), NYB TRY and MKD will request approval from their EVP-in-charge and send notice to Head Office Treasury Department and Head Office Global Markets Department. Afterward they will send order to NYB-OSD for transferring the Head Office Securities to the FRB Pledge Account (U102).

纽约分行司库在纽约当地时间中午12点后仍预判纽约分行当日日终联储余额很可能存在缺口，而纽约分行金融市场部已积极调动一切手段（包括使用总行债券叙做隔夜回购：纽约分行应优先使用总行债券叙做隔夜回购交易，只有在由于市场原因[[1]](#footnote-1)无法通过隔夜回购获取美元的情况下，才可以使用总行债券作为押品从联储贴现窗口借款）仍无法弥补资金缺口的情况下，纽约分行司库会同金融市场部在报请纽行分管行领导同意后，报备总行总行司库以及全球市场部，之后发送把总行债券调到联储质押账户（U102）的指令给运营服务部。

1. NYB selects Head Office securities in the following order when making pledge to FRB: ① U.S. Treasuries, ② relatively large inventory of that particular security.

纽约分行使用总行债券作为押品从联储贴现窗口借款选择债券应遵循以下原则：①美国国债；②该支债券存量较大。

1. The cut-off time for security free delivery at FRB system is usually 6:30 pm EST. In view of the time required for operation by NYB-OSD, NYB TRY and MKD is supposed to deliver the transfer order to OSD by 3:30, allowing enough time for OSD to complete the transfer according to its internal procedure.

向联储质押账户调券的截止时间是下午6点30分，考虑到运营服务部调券操作需要的时间，指令原则上须在下午3点30分前发送至运营服务部。运营服务部按照内部流程完成调券工作。

1. NYB-TRY sends Head Office Treasury Department Liquidity Management Team and Global Markets Department Foreign Currency Liquidity Team through Notes a detailed list of the securities pledged to FRB before the end of the day.

纽约分行司库应于当日下班前通过Notes把调用总行债券的详细清单发送给总行司库流动性团队和全球市场部外币流动性团队。

1. On the next business day, after the FRB Discount Window borrowing has been paid off, NYB-OSD shall transfer back all pledged Head Office securities from U102 to the original custody account according to its internal procedure.

纽约分行运营服务部在第二工作日纽行还清联储贴现窗口借款后立即自行按内部流程把所有已质押的总行债券从联储质押账户调回原托管户。

1. Assurance Methods (办法实施监督)
   1. Awareness Methods (办法颁布)

The awareness of this Procedure will build among the key stakeholders via email at least on an annual basis with key changes summarized. Each stakeholder shall acknowledge receipt and understanding of the Procedure.

本办法应至少每年一次将更新总结通过电子邮件传达。收件人应了解其内容。

* 1. Adherence Monitoring (办法遵循监测)

TRY, MKD and OSD are responsible to conduct its operations regarding using HO securities for overnight REPO or as pledge for FRB Discount Window borrowing according to this Procedure and ensure its compliance. IRMs perform their review and challenge responsibilities. Internal Audit will also perform periodic monitoring of compliance through its testing or audit program.

纽约分行使用总行债券叙做隔夜回购交易和使用总行债券作为抵押从联储贴现窗口借款时纽行司库，金融市场部和运营服务部须严格遵照本流程进行操作；风险管理相关部门进行再审；审计部也将通过测试和审计项目做定期审查。

* 1. Update Requirements (定期更新)

TRY should ensure this Procedure remains relevant by monitoring internal and external circumstances to determine if and when a procedure update may be required.

司库应监测内部操作和外部监管情况, 以确定程序更新的需要,确保按需更新。

* 1. Consequences of Violation (违规后果)

Failure to comply with this Procedure will be escalated to the management under certain circumstances, which will consider appropriate remedial actions. Violations of the Procedure are grounds for disciplinary actions, adapted to the circumstances of the particular violation and having as a primary objective furtherance of BOCNY's interest in preventing violations and making clear that violations are neither tolerated nor condoned. Violations may subject employees to a range of disciplinary actions, up to and including termination of employment.

当违规情况发生时，除可按严重程度提报至管理层外，并将采取措施防止将来再次出现类似情况。违规行为可能使员工受到包括终止雇佣关系在内的纪律处分。

1. 参考资料Reference Information
   1. Glossary (缩略语)

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| Abbreviation(缩写) | Name(名称) |
| BOCNY /NYB | Bank of China，New York Branch 中国银行纽约分行 |
| TRY | Treasury 司库 |
| MKD | Global Markets Department 金融市场部 |
| OSD | Operational Service Department 运营服务部 |
| FRB | Federal Reserve Bank 美国联邦储备银行 |

1. 附录Appendix

不适用

Not Applicable

1. 比如美国市场中午12点后，考虑到美联储债券结算的截止时间为下午3点，通常是无法再叙做隔夜回购交易的。For example, due to the cut-off time at FRB for security DVP settlement is 3 pm, NYB generally cannot conduct overnight repo after 12pm. [↑](#footnote-ref-1)