

10c-1 vs SFTR

10c-1
(proposed)

VS

SFTR

Not yet defined/confirmed - expected to be US Domestic (security/entity)	Scope	European entities and their branches. European branches of non-European entities. All securities, globally.
Securities Lending	Transaction Type	Sec Lending, Repo, Buy/Sell Back, Margin Lending
Approximately 15 (Not all fields are identical or included in SFTR)	Total Number of Fields	156
Within 15 mins for transactions/modifications Daily (EoD) for Securities Inventory balances	Timing	T+1
Transaction data - "as soon as practicable" Securities Inventory data no later than T+1	Publication of aggregated / anonymised data	Weekly
One-sided (Lender) RNSA (FINRA)	Reporting Party / Destination	Dual-sided ESMA Regulated Trade Repository
Registered Broker Dealer	Reporting Agents	No specific requirements
3 years	Data Retention	5 years from date of termination
RNSA (FINRA)	UTI Generation	Waterfall to determine responsibility
Type and %margin	Collateral Reporting	Type, %margin, haircut, instrument static data
Agent Lender Inventory (Including Broker Dealers)	Regulation Specific	Collateral Re-Use