The second webinar in the series will discuss on the LEI Application in US Customs and Application in the US Bank.

**LEI Application in US customs**
The U.S. Customs and Border Protection (CBP) Global Business Identifier (GBI) Initiative is an interagency trade transformation project that aims to: enable the U.S. Government to use a “common language” employed by the global trade community; improve data quality and efficiency; and better position the U.S. Government to identify high-risk import shipments and facilitate legitimate trade and customs transactions. Beginning in early 2022, CBP will launch a GBI Evaluative Proof of Concept to test three identifiers and identify an optimal identifier solution. CBP’s current proposed solution will leverage the LEI to identify legal entities, direct and ultimate parent relationships, and ownership.

**LEI Application in the US Bank**
JP Morgan will explain its role as a Validation Agent in the Global LEI System and describe how it uses LEI to support regulatory compliance as well as operational efficiency.
Ms. Bigelow also oversees all interagency technology enhancements to the Automated Commercial Environment (ACE), also known as the U.S. Single Window, the data exchange and warehouse through which all imports to and exports from the U.S. are processed. ACE is the system of record by which electronic trade and related financial transactions are conducted and recorded by CBP.

Immediately prior to assuming her current role in CBP’s Office of Trade, Ms. Bigelow served as Deputy Director, Performance Strategy & Systems, U.S. Department of Commerce (DOC) where she led the planning and execution of all performance, planning, budget integration, risk management and evaluation mandates for the DOC Office of the Secretary and across all 12 Commerce bureaus. Among her accomplishments were service as senior advisor in the development and implementation of core and emerging policy areas across the Commerce strategic portfolio (e.g. IT Modernization; National Business Assistance; Digital Economy; Regional Innovation; U.S. Data Strategy; Environmental Resilience and Natural Capital; Federal R&D; Advanced Manufacturing; and the President’s Reform Agenda) and issuance of the first-ever Commerce wide Customer Experience Strategy, which included a roadmap to maximize the service and information benefits of a unified Customer Relationship Management (CRM) system for the Department.

Ms. Bigelow’s previous U.S. Federal government service also includes: Director, Performance & Risk Management for the First Responders Network Authority (FirstNet); Director of Enforcement Operations, U.S. Commodity Futures Trading Commission; and Director of Planning & Budget, National Gallery of Art.

Before entering public service, Ms. Bigelow spent nearly a decade as an investment banker and strategy consultant, specializing in international middle-market mergers & acquisitions, venture capital and project finance. Ms. Bigelow holds a B.Sc., magna cum laude, from the Wharton School of Business, and completed all coursework (ABD) towards a PhD in Art History at Indiana University. In 2016, Ms. Bigelow was awarded the Commerce Gold Medal, the highest form of honorary recognition the Department bestows, for distinguished contributions to Organizational Development.
Amy Kabia was appointed to the GLEIF Board of Directors in June 2020. She's a data management professional with over 24 years of experience in financial services. Ms. Kabia is the global head of Party Reference Data Operations at JPMorgan Chase (JPMC). She leads a firmwide utility responsible for the creation and maintenance of legal entity (“party”) reference data. Prior to her current role, Ms. Kabia was the Chief Data Officer for JPMC’s Treasury and Chief Investment Office function.

Ms. Kabia spent several years implementing credit risk and market risk models for regulatory capital calculations. From this experience she gained an appreciation for the criticality of reference data in managing risk. She specializes in “design for data quality,” a methodology that utilizes data architecture, operational responsibility, and control design to ensure data is created and maintained with good quality. She leverages JPMC’s Artificial Intelligence practice to improve data quality using low touch methods. She enjoys working with front office partners to demonstrate that reference data can be an enabler, not a constraint.

Ms. Kabia obtained a Bachelor of Science from the University of Colorado and is a certified Six Sigma Black Belt.
SESSION 1

MS. LEA-ANN BIGELOW
Director, Interagency Collaboration
U.S Customs and Border Protection Office of Trade
Global Business Identifier (GBI) Initiative

Asian Development Bank (ADB) – Global Legal Entity Identifier (GLEIF)

Joint Asia Webinar Series on the Legal Entity Identifier (LEI)

June 30, 2021
The 21st Century Customs Environment

Customs Environment in Fiscal Year 2020

- Processed **32.8 million** import entries
- Received more than **28.5 million cargo containers** at **328 U.S. ports** of entry
- Seized **$1.3 billion** worth of product with intellectual property rights violations.
- Over **365,000 active Importers of Record** and **16,500 Customs Brokers**
- **148 million de minimis value shipments** via air cargo and **94 million de minimis value shipments** via truck environment.

Customs Challenges

- The sheer volume of shipments that are imported into the U.S. leads to risk management challenges.
- CBP requires filers to submit a Manufacturer/Shipper Identification Number (MID) for all imports.
- However, the MID lacks the data quality, data richness, and uniqueness required to provide the U.S. Government with accurate supply chain insights.
- The GBI Initiative was formed as a result of the extensive pain points associated with the MID.
What is the **Global Business Identifier (GBI) Initiative?**

- The GBI Initiative is an interagency **trade transformation project** that aims to develop a **single identifier solution** that will:
  - Improve the U.S. Government’s (USG) ability to effectively **identify high-risk shipments** and facilitate legitimate trade
  - Create a “**common language**” between the USG and Trade
  - Improve **data quality and efficiency** for identification, enforcement, and risk assessments

- Rather than develop an internal identifier, CBP will leverage existing global identifiers for the GBI solution which ideally will **uniquely identify**:
  - Main Legal Entity and Ownership
  - Specific Business and Global Locations
  - Supply Chain Roles and Functions
What are the **current entity identifiers being considered**?

The current proposed GBI solution includes **three globally used identifiers** that are each managed by external entities.

<table>
<thead>
<tr>
<th>Entity Identifier Name</th>
<th>Entity Identifier Owner</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Legal Entity Identifier (LEI)</strong></td>
<td><img src="image" alt="LEI Logo" /></td>
</tr>
<tr>
<td>20-digit, alphanumeric identifier with underlying reference data elements unique to a legal entity. Over 1.7 million LEIs issued worldwide.</td>
<td><strong>LEI</strong> GLOBAL LEGAL ENTITY IDENTIFIER FOUNDATION</td>
</tr>
<tr>
<td><strong>Data Universal Numbering System (DUNS)</strong></td>
<td><img src="image" alt="DUNS Logo" /></td>
</tr>
<tr>
<td>9-digit numeric and non-indicative identifier that identifies unique business establishments with library of over 200 reference data elements. Over 300 million DUNS issued worldwide.</td>
<td><strong>Dun &amp; Bradstreet</strong></td>
</tr>
<tr>
<td><strong>Global Location Number (GLN)</strong></td>
<td><img src="image" alt="GLN Logo" /></td>
</tr>
<tr>
<td>13-digit numeric identifier with varying sets of underlying reference data elements that are customizable to location, function, and operations. Over 2 million companies utilize GS1 Standards.</td>
<td><strong>GS1</strong></td>
</tr>
</tbody>
</table>
What are the **core GBI competencies**?

The GBI solution must meet all eight core competencies to meet the **USG data needs**

<table>
<thead>
<tr>
<th>GBI Core Competencies</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="#">Globally Unique</a></td>
</tr>
<tr>
<td><a href="#">Separate Legal Entities</a></td>
</tr>
<tr>
<td><a href="#">Location &amp; Function Specific</a></td>
</tr>
<tr>
<td><a href="#">Tracks Supply Chain Roles</a></td>
</tr>
<tr>
<td><a href="#">Managed for Accuracy</a></td>
</tr>
<tr>
<td><a href="#">Oversight &amp; Governance</a></td>
</tr>
<tr>
<td><a href="#">Data Sharing</a></td>
</tr>
<tr>
<td><a href="#">Internationally Recognized</a></td>
</tr>
</tbody>
</table>

The three identifiers will be tested on these core competencies
What is the GBI Evaluative Proof of Concept (EPoC)?

The interagency GBI Working Group, under the Border Interagency Executive Council (BIEC), has developed an Evaluative Proof of Concept (EPoC) that will test the proposed solution and identify the optimal combination of entity identifiers to best meet USG needs.

In its current proposed design, the GBI EPoC will:

✓ Operate within the USG’s Single Window platform
✓ Include all three entity identifiers under consideration
✓ Require volunteer trade participants to submit all three identifiers (LEI, GLN, DUNS) for the manufacturer/producer, seller, and shipper via the CBP Automated Broker Interface (ABI)
  o Distributor, exporter, and packager will be optional

GBI EPoC implementation will be divided into two phases:

1) Phase I: Cargo Release and Targeting
   o Phase I is expected to launch in Spring of 2022

2) Phase II: Entry Summary

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What is the scope of the GBI EPoC?

To ensure a fully comprehensive GBI EPoC that accurately reflects current trade operations, the EPoC will encompass **ten countries of origin** and **six product categories** – each representing high-risk areas, partner countries, and covering a diversity of USG jurisdictions.

### Border Five Countries

- Australia
- Canada
- New Zealand
- United Kingdom

### Other Countries of Interest

- China
- France
- Mexico
- Vietnam
- Italy
- Singapore

### Product Categories**

- Alcohol
- Medical Devices
- Personal Items
- Seafood
- Toys
- U.S. Goods Returned*

*A list of Harmonized Tariff Schedule (HTS) codes have been identified

*To be included in Phase II

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What are the **anticipated GBI benefits?**

**Who is Who clarity**

**Improved data quality**

**Globally unique and adheres to international standards**

**Ownership and affiliation insights**

**Stronger targeting and risk assessments**

**Better identification of increasingly complex supply chain networks**

**More robust** than the World Customs Organization (WCO) Trader Identification Number (TIN)

**Provides the opportunity to test and give feedback** on the GBI design and scope

**Empowers** trade to **manage and validate** their data

**Globally unique and adheres to international standards**

**Further streamline import data collection**

**Broad sector coverage**

**Utilization of identifiers that trade participants already possess**

**Facilitation benefits** for participation

**Potential increased protection from counterfeiting**

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Which entity identification systems might be impacted by the GBI?

The U.S. Government uses more than 50 distinct entity identification systems*. CBP identified the following **twenty-five (25) entity identification systems** that may be impacted and streamlined by the GBI, based on common data attributes collected:

<table>
<thead>
<tr>
<th>Entity Identification System</th>
</tr>
</thead>
<tbody>
<tr>
<td>499 Filer ID</td>
</tr>
<tr>
<td>BEA Foreign Direct Investment Identification Number</td>
</tr>
<tr>
<td>Central Index Key (CIK)</td>
</tr>
<tr>
<td>Commercial and Government Entity (CAGE)</td>
</tr>
<tr>
<td>Company Identifier (CID)</td>
</tr>
<tr>
<td>CUSO Registry Number</td>
</tr>
<tr>
<td>Data Universal Numbering Systems (DUNS) Number</td>
</tr>
<tr>
<td>Employer Identification Number (EIN)</td>
</tr>
<tr>
<td>FCC Registration Number (FRN)</td>
</tr>
<tr>
<td>FDA Establishment Identifier (Facility FEI)</td>
</tr>
<tr>
<td>Federal Deposit Insurance Corporation (FDIC) Certificate Number</td>
</tr>
<tr>
<td>Foreign Entity ID</td>
</tr>
<tr>
<td>GS1 Company Prefix (GCP)</td>
</tr>
<tr>
<td>Home Mortgage Disclosure Act (HMDA) Respondent ID</td>
</tr>
<tr>
<td>International Air Transport Association (IATA) Code</td>
</tr>
<tr>
<td>International Fisheries Trade Permit (IFPT) Number</td>
</tr>
<tr>
<td>Large Trader Identification (LTID) Number</td>
</tr>
<tr>
<td>Legal Entity Identifier (LEI)</td>
</tr>
<tr>
<td>Manufacturer/Shipper Identification Code (MID)</td>
</tr>
<tr>
<td>National Drug Code (NDC) Labeler Code</td>
</tr>
<tr>
<td>National Provider Identifier (NPI)</td>
</tr>
<tr>
<td>Registered Identification Number (RN)</td>
</tr>
<tr>
<td>Regulated Persons Index (RPI)</td>
</tr>
<tr>
<td>Replication Server System Database (RSSD ID)</td>
</tr>
<tr>
<td>Standard Carrier Alpha Code (SCAC)</td>
</tr>
</tbody>
</table>

*The full list of entity identification systems can be found in “Envisioning Comprehensive Entity Identification for the U.S. Federal Government” published by Data Foundation and GLEIF in 2018
What are some existing USG initiatives that synergize with the GBI?

- Importer of Record (IoR)
- Blockchain
- E-commerce

21st Century Customs Framework (21CCF)

Commercial Customs Operations Advisory Committee (COAC)

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What international engagement has CBP done?

World Customs Organization (WCO)

- CBP continues to engage with the WCO on the GBI initiative
  - On October 1, 2020, in partnership with GLEIF, CBP provided a GBI overview to the WCO SAFE Working Group
  - Members of the WCO Safe Working Group expressed support to further explore the integration of the TIN and LEI, as this has the potential to enhance efficiency

Border Five

- In July 2020, the Border Five Heads stood up the GBI / Trader Identification Number (GBI/TIN) Expert Correspondence Group (ECG) to identify solutions and contemporary innovations to assist in the enhanced identification of trade entities in the global supply chain
  - Members include Australia, Canada, New Zealand, the United Kingdom, and the United States
### How can trade industry participate in the GBI EPoC?

**How to Participate in the GBI EPoC**

**Federal Register Notice**
- Respond to a Federal Register Notice (FRN) that will likely be published in the Winter of 2022

**Obtain the Identifiers**
- Obtain all three identifiers (LEI, DUNS, GLN)

**Cargo Release / Entry Submission Process**
- Through a customs broker or as a self-filer, submit all three identifiers for the supply chain roles at Cargo Release / Entry via the CBP ABI

Participants will be given **ample time to respond to the FRN** and **obtain the three identifiers** prior to the launch of the GBI EPoC

### Volunteer Criteria

**Who Can Participate**
- Trade members who conduct business in a country of origin and import a product associated with the scope
- Companies of all sizes

**EPoC Support**
- CBP is working with the identifier companies to potentially offer the identifiers at a reduced price to EPoC participants
- The identifier companies will provide a point of contact to answer Trade participants’ inquiries

CBP welcomes suggestions on **speaking / briefing engagements** to provide a GBI overview to interested Trade members

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SESSION 2

MS. AMY KABIA
Managing Director
Party Reference Data Operations
JP Morgan Chase
LEI in the United States

ADB-GLEIF Joint Asia Webinar Series on LEI | June 30, 2021
LEI is a globally recognized ID for legal entity identification

Born out of the 2008 financial crisis to unambiguously identify parties in financial transactions

What is an LEI
- 20-digit code issued by accredited organizations worldwide
- Global, open and nonproprietary standard for entity identification
- Managed by Global LEI Foundation as a broad public good
- Trusted worldwide as a verified source of identity information
- Used for risk management, data management, and digital identity

Sample of JPMC entities with LEIs

<table>
<thead>
<tr>
<th>Country</th>
<th>Entity Status</th>
<th>Legal name</th>
<th>LEI</th>
<th>Reg. Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malaysia</td>
<td>ACTIVE</td>
<td>J.P. MORGAN CHASE BANK BERHAD</td>
<td>5493003D5VPYWT8D9W93</td>
<td>ISSUED</td>
</tr>
<tr>
<td>China</td>
<td>ACTIVE</td>
<td>JPMorgan Chase Bank (China) Company Limited</td>
<td>549300P9GB800K9V817</td>
<td>ISSUED</td>
</tr>
<tr>
<td>United States of America</td>
<td>ACTIVE</td>
<td>JPMorgan Chase Bank, National Association</td>
<td>7H6GLKDRIUVQF37RNE97</td>
<td>ISSUED</td>
</tr>
<tr>
<td>United States of America</td>
<td>INACTIVE</td>
<td>CHASE BANK USA, NATIONAL ASSOCIATION</td>
<td>P75W438B18E5LPSF0N03</td>
<td>MERGED</td>
</tr>
</tbody>
</table>
US regulators and federal agencies have embraced LEI

US regulations referencing LEI continues to grow and expand to new sectors

- Securities and Exchange Commission (SEC)
- Commodities and Futures Trading Commission (CFTC)
- Federal Deposit Insurance Corporation (FDIC)
- National Association of Insurance Commissioners (NAIC)
- Federal Energy Regulatory Commission (FERC)
- Department of the Treasury
- Federal Reserve

Source: GLEIF
Regulatory mandates that impact ability to transact have driven LEI issuance

75% of LEI issuance is due to European regulations

Source: GLEIF
Benefits of LEI for financial institutions are significant

LEI improves data management, risk management, and operational efficiency

- Data quality
- Data connector linking to vendor data sets
- Compliance with emerging regulations
- Counterparty credit risk aggregation
- Fraud detection and screening for bad actors
- Entity validation in payments transactions
- Onboarding efficiency with clients and suppliers
Benefits of LEI for clients

Global identity and digital identity are facilitated by LEI

**Globally Recognized Identity**
- Simplifies cross-border transactions
- Promotes financial inclusion

**Digitally Verifiable Identity**
- Credentials for companies and employees
- Facilitates digital commerce

Source: GLEIF
Validation Agent role in the global LEI system

Mechanism to increase LEI issuance and a valuable service for clients

- **GLEIF introduced the Validation Agent role in September 2020**
  - Regulated financial institutions leverage their identity verification processes to facilitate LEI issuance
  - Reduces the cost of LEI registration by eliminating duplication

- **JPM became a Validation Agent in October 2020**
  - Simplifies client onboarding for entities subject to LEI mandates
  - Increases the number of companies with LEIs as a public good

- **Validation Agent (VA) versus Registration Agent (RA)**
  - RAs facilitate LEI issuance by passing information to an LOU
  - VAs facilitate LEI issuance by performing identity verification which the LOU can rely on
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Joint Asia Webinar Series on

Legal Entity Identifier (LEI)
Part 3 - Introduction of the LEI in EU

Virtual Event via Zoom
1 July 2021, Thursday
4:00PM Manila Time / 10:00 CET

Our Speakers

FRANCOIS LAURENT
Senior Manager, Statistics Department
European Central Bank

GUILLERMO DE LA FUENTE
Senior Treasury and Risk Manager, SITA