

Investment adviser choices and BBH models

Investment Advisers (IAs)* have two basic options for how they can affirm their US trades. They can have their **custodian perform affirmations on their behalf** or they can **perform the affirmations themselves**, either directly or with the help of a third party. BBH can support any affirmation model chosen by the IA by means of the below models which will be applied to the corresponding BBH custody account.

1. Confirm Matching BBH performs trade affirmation on behalf of our client by matching broker confirm from DTCC ITP platform to client trade instruction

2a. Self Affirmation with Trade Instruction Client affirms the trade themselves or through a third party and sends a matching trade instruction to BBH where BBH matches the client trade instruction to the affirmation received from DTCC ITP

3. Multi-Affirmations Client maintains one
account in which both 1.
Confirm Matching and
2a. Self Affirmation with
Trade Instruction models
can be leveraged

2b. Self Affirmation with No Trade Instruction Client affirms the trade themselves or through a third party and BBH uses the resulting affirmation from DTCC ITP as the client trade instruction

*Investment adviser: Defined under the Investment Advisers Act as referenced in the final SEC T+1 Rules which can be found at https://www.sec.gov/rules/final/2023/34-96930.pdf.

A list of registered Investment advisers can also be found at IAPD - Investment Adviser Public Disclosure - Homepage (sec.gov)

Market and provider conditions for success

In order to support the IA's chosen affirmation models certain configurations must take place and conditions must be met that will allow the affirmation to be successfully completed. Some of the most important of which are summarized below.



TradeSuite ID (TSID)



Standing Settlement Instructions (SSIs)



Custody Account Set Up



Trade Instructions

- All affirmations are processed in DTCC's Institutional Trade Processing (ITP) platform
- In order to affirm a trade a TradeSuite ID must be obtained from DTCC ITP
- The configuration and owner of the TSID may vary based on the affirmation model chosen
- Successful affirmations are dependent on the information provided to Brokers and Counterparties through SSIs
- Critical details include but are not limited to: Agent ID, TSID, Local Account at Agent
- The details provided in SSIs must align with the affirmation model chosen by reflecting the correct IDs for the above entities
- Regardless of which affirmation model is chosen by the IA, it is critical all Custodians and Account Operators between the adviser and DTCC be informed of the chosen affirmation model.
- Account coding to reflect the chosen model and ID linkages (e.g. between the chosen TSID and custodian account) will likely be required at each Custodian/Account Operator
- Affirmations can replace the need for a trade instruction but not in all cases so determining where instructions will be sent and where they will not is critical to a successful trade settlement. These decisions must be communicated to providers along with the affirmation model
- Trade instructions must adhere to DTCC and provider deadlines. Late or missing instructions may result in an unaffirmed trade or a failed trade so timing of instruction delivery is critical to both the affirmation process and the settlement process

Have questions? Contact one of our experts:



Katelyn O'Grady Custody Product Manager katelyn.ogrady@bbh.com +1.617.772.1764



Derek Coyle
Custody Product Manager
derek.coyle@bbh.com
+352.474.066.6413

For the latest insights visit:









💳 Brown Brothers Harriman

NEW YORK BEIJING BOSTON CHARLOTTE CHICAGO DUBLIN GRAND CAYMAN HONG KONG HOUSTON
JERSEY CITY KRAKÓW LONDON LUXEMBOURG NASHVILLE PHILADELPHIA TOKYO WILMINGTON ZÜRICH WWW.BBH.COM

Brown Brothers Harriman & Co. ("BBH") may be used to reference the company as a whole and/or its various subsidiaries generally. This material and any products or services may be issued or provided in multiple jurisdictions by duly authorized and regulated subsidiaries. This material is for general information and reference purposes only and does not constitute legal, tax or investment advice and is not intended as an offer to sell, or a solicitation to buy securities, services or investment products. Any reference to tax matters is not intended to be used, and may not be used, for purposes of avoiding penalties under the U.S. Internal Revenue Code, or other applicable tax regimes, or for promotion, marketing or recommendation to third parties. All information has been obtained from sources believed to be reliable, but accuracy is not guaranteed, and reliance should not be placed on the information presented. This material may not be reproduced, copied or transmitted, or any of the content disclosed to third parties, without the permission of BBH. Pursuant to information regarding the provision of applicable services or products by BBH, please note the following: Brown Brothers Harriman Fund Administration Services (Ireland) Limited and Brown Brothers Harriman Investor Services Limited is authorised and regulated by the Financial Conduct Authority, Brown Brothers Harriman (Luxembourg) S.C.A is regulated by the Commission de Surveillance du Secteur Financier. All trademarks and service marks included are the property of BBH or their respective owners. © Brown Brothers Harriman & Co. 2024. All rights reserved. IS-09817-2024-04-02