

Credit Derivatives Governance Committee Minutes

September 11, 2025

Attendees:

GC Member Firm	Participant
D. E. Shaw & Co., L.P.	Kevin Bell
Elliott Investment Management L.P.	Clarke Armatis
Pacific Investment Management Company LLC	John Devir
Rokos Capital Management (RCM)	Rushabh Doshi
Barclays Bank plc	Romain Rachidi
BNP Paribas	Damien Granger
Deutsche Bank AG	Markus Gebhard
Goldman Sachs	Abel Elizalde
JP Morgan	Paul Glasgow
Morgan Stanley	Sajan Shah
RBC Capital Markets	Santosh Sateesh
Wells Fargo	Bryon Karagus
ICE Clear Credit LLC	Eric Nield
LCH S.A.	Adam Johnson
S&P Global	Charles Palmer
Also in attendance:	
Linklaters	David Lucking
A&O Shearman	Paul Allan
ISDA	Fred Quenzer
ISDA	Jonathan Martin

ISDA introduced the newly formed Credit Derivatives Governance Committee (the “Committee”), clarified its independent status from ISDA, outlined its mandate, and explained the roles of legal counsel in providing guidance for the Committee and its members. All members of the Committee were reminded of the antitrust acknowledgement in the Committee Charter - if any member of the Committee has any queries in this regard, then the input of legal counsel will be obtained in relation to the relevant matter in order to safeguard compliance with applicable laws.

ISDA clarified that the Committee is designed to oversee and vote on developed proposals, delegating the detailed work of developing those proposals to specialized technical forums, which will report back for committee votes.

Charles Palmer from S&P Global volunteered and was confirmed without objection as the initial Chair of the Committee. ISDA and DC counsel then outlined the rotation policy of the Chair, meeting minutes process, and the structure for agenda and DC rule change submissions. ISDA is working with DC counsel to update the DC website, which will include sections for meeting agendas, minutes, and a submission form for market participants to propose DC rule changes for Committee consideration.

ISDA described the Committee's standard operating procedures, including meeting frequency, DC rule change process, and the potential adoption of a participation agreement, with input from DC counsel on its legal implications. ISDA explained that the participation agreement would be a simple document for firms to acknowledge their participation and agree to keep discussions confidential, with David Lucking adding that it would primarily serve as an acknowledgment rather than imposing obligations. ISDA requested Committee members consult their legal departments regarding the need for a participation agreement and to communicate their preferences within the next few weeks.

ISDA stated that the Charter requires the holding of two mandatory Committee meetings per year (October and April) and proposed an additional meeting in November to address the volume of DC rule changes requiring consideration.

A&O Shearman suggested that until the dedicated Committee webpage is built, meeting minutes can be published under a temporary heading in the 'About DCs' section of the DC website to ensure timely public access.

ISDA presented the background and details of proposed changes to the Standard Reference Obligation (SRO) process, including streamlined legal review, public challenge procedures, and the role of S&P Global as SRO Administrator, with input from A&O Shearman and responses to questions from members of the Committee. ISDA explained that the large majority of SROs have not been updated since 2014, and S&P Global, as the SRO administrator, proposed a more efficient process for adding new SROs, reducing the need for lengthy legal reviews unless challenged. Under the new process, S&P Global as SRO Administrator will publish a list of proposed SROs; firms can challenge any entry. Unchallenged proposed SROs will become new SROs whilst those

that are challenged will be addressed under the SRO Rules. The process for resolving challenges depends on the nature of the relevant challenge – options include referring the proposed SRO for a legal review or selecting an alternative proposed SRO. The volume of legal reviews that will be funded will depend on the budget to be provided to support the new process.

ISDA clarified that the scope of the proposed alternative process for selecting SROs would apply to index names and single names that are cleared (i.e. names where there is already a market standard reference obligation), with a task force already preparing an initial list of reference obligations for the first round. ISDA described the public review process: the initial list will be published for 30 days, with an additional 15 days for further challenges if any are received, ensuring market participants have ample opportunity to provide input. A&O Shearman noted that the Committee will be responsible for deciding whether to approve the proposed SRO rule changes, with the exposure draft already published by the DCs for public comment on the DC website.

ISDA summarized recommended changes to the DCs from a report commissioned by ISDA, including more detailed decision statements, enhanced transparency, and increased independence from market participants and noted these were supported by both market participants and regulators. ISDA proposed the appointment of a regulated entity to serve as DC Secretary, manage the DC website, and oversee operational decisions, aiming to build trust with regulators and market participants. ISDA emphasized the need for the Committee to define a clear mandate and end goal for the DC's future structure, including whether decision-making should shift to a panel of outside experts or simply add independent members to the existing DCs for additional checks and balances.

A Committee member raised the issue of funding for the proposed changes, and ISDA responded that funding solutions would be sought through the RFP process for selecting a new DC Secretary.

ISDA invited Committee members to share their thoughts and questions on the proposed changes, indicating that further discussion and a vote would occur at a future meeting, and that ISDA may reach out individually for input.

A Committee member inquired about the process for submitting agenda items, highlighting the need to revisit potential DC rule enhancements that had previously been considered but not adopted. ISDA confirmed that members can email proposals directly to ISDA for inclusion in future meeting agendas.

ISDA then raised the possibility of allowing votes outside of Committee meetings (e.g. via email) for certain procedural matters. ISDA noted that while DC rule changes should not be voted on outside of Committee meetings, procedural votes (e.g., setting up working groups) could be conducted via email if unanimously agreed, and asked Committee members to provide feedback on this approach.

The meeting was then adjourned.