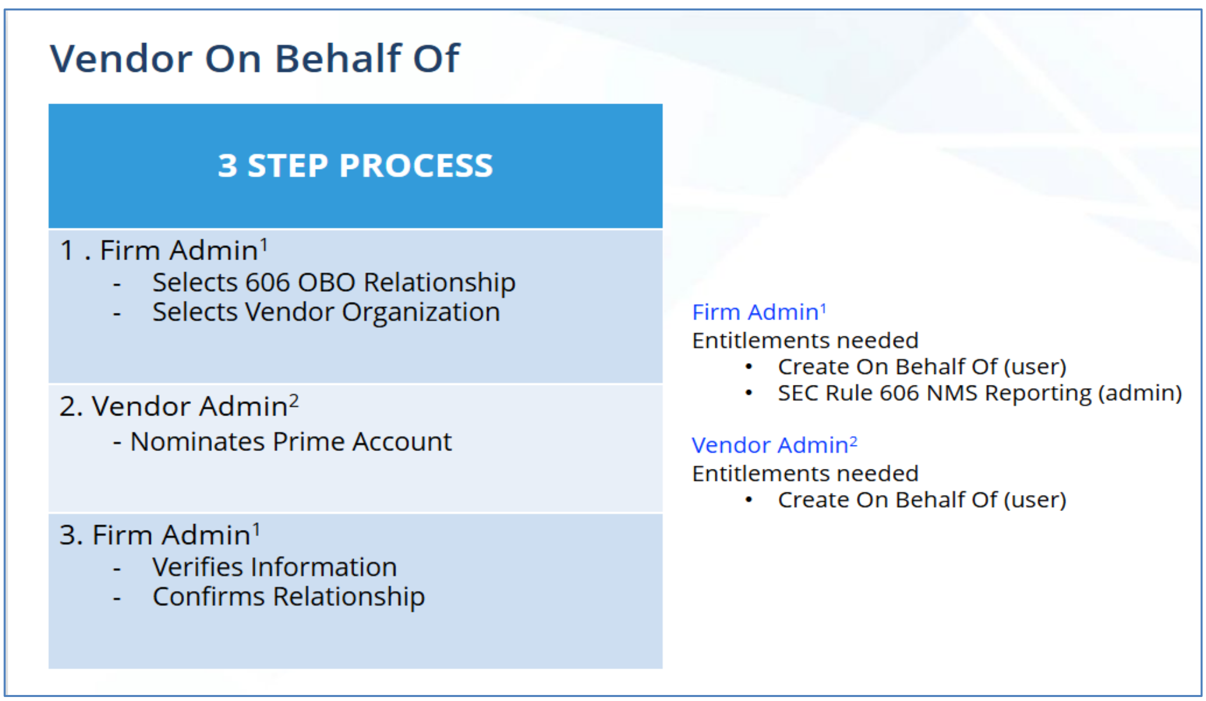
On Behalf Of (OBO) Guide

11/20/2025

FINRA offers the capability for one organization to submit certain filings and perform reporting On Behalf Of (OBO) another Member Firm by establishing a relationship in the FINRA Entitlement Program between two organizations. To date, two applications are participating in OBO though more systems will be added in the future. OBO functionality supports both human accounts and machine (File Transfer) accounts.

Benefits of On Behalf Of (OBO) Relationship Requests

- The 3-step online workflow process will enable a firm to create an OBO Relationship with a vendor*. The workflow guides the requester and recipient step-by-step through the process. Requests will process automatically once approved by each organization through the workflow.



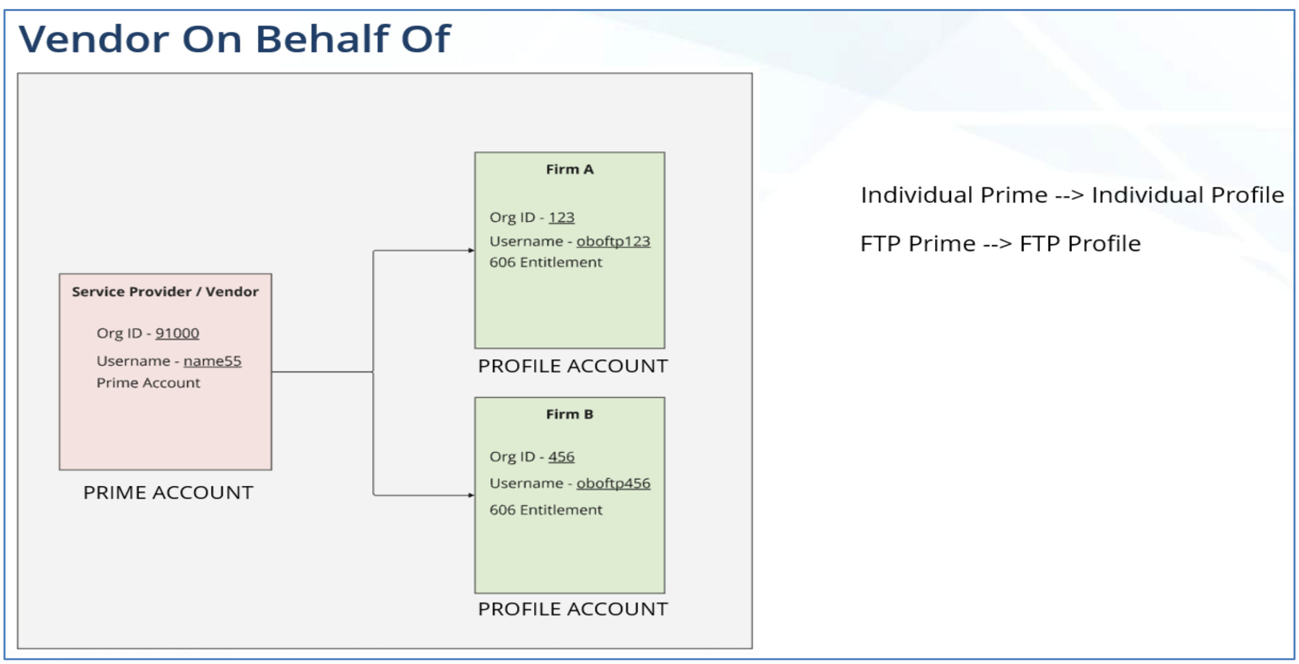
- The OBO Relationship workflow is managed through specific FINRA Entitlement Program privileges. These privileges allow organizations to restrict this entitlement only to users who need access to create or view OBO Relationships based on their current job responsibilities.
- OBO Relationship requests expire and are no longer available after 30 days if the workflow isn't finished. This expiration policy keeps requests current and helps prevent unintended approvals.

***Vendor = Service Provider or organization working on behalf of other firms.**

- An On-Behalf-Of (OBO) Relationship enables a Firm SAA or submitter with the 'Create On Behalf Of Relationship (user)' entitlement to grant permission to a designated vendor* to submit authorized activities on the firm's behalf.
- A single vendor* (Prime) account can establish On-Behalf-Of (OBO) Relationships with numerous firm (Profile) accounts, whether human or File Transfer Protocol (FTP) accounts. However, each specific OBO Relationship between a vendor* and firm must be designated for either human to human accounts or FTP to FTP accounts exclusively.
- Any individual with the firm with an active FINRA Gateway account entitled with the ‘Create On Behalf Of Relationship (user)’ entitlement can create a new or view existing OBO Relationships in the FINRA Entitlement Program.
- Any individual with the firm or vendor* with an active FINRA Gateway account entitled with the View On Behalf Of Relationship entitlement can view existing OBO Relationships in the FINRA Entitlement Program.
- The only users who can view the status of their OBO Relationship request as it moves through the workflow are those users with ‘Create On Behalf Of Relationship’ or ‘View On Behalf Of Relationship’ entitlement.
- The delegated vendor* has the option to select an existing account or create a new account that will be permitted to engage in the authorized activities permitted by the OBO Relationship provided the account has ‘Enable On Behalf Of’ entitlement.
- It is best practice to create a new vendor* (Prime) account with ‘Enable on Behalf Of’ entitlement rather than use accounts that are already in use today.

    - **Prime account:** This account allows a vendor to act on behalf of a firm and permits the account to engage in the authorized activities covered by the OBO Relationship. This account must be entitled with ‘Enable On Behalf Of’ to be selected as a Prime account in the Requests and Flings OBO Workflow.

    - **Profile account:** This account is systematically created for the firm after an OBO Relationship is agreed to by the vendor and permits the vendor to perform specific filing and/or reporting services on the firm’s behalf. The Profile account name is associated with the Prime account owner.



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This OBO Guide covers information specific to OBO. For general help questions for SAAs and AAs, go to the FINRA Entitlement Program > Entitlement Help &Training > FINRA Entitlement Reference Guide.

Table of Contents

Current FINRA Systems eligible for On Behalf Of (OBO)

1. For SEC Rule 606(a) filex instructions, see the FINRA Rule 6151 Order Routing Information Filing Guide.
2. For Filex instructions, see the FileX User Guide.

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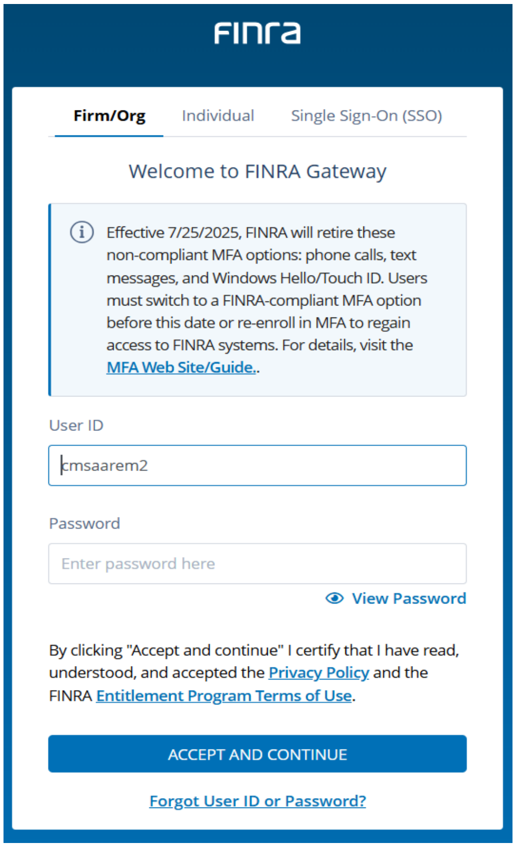
Section 1: How to Create an On Behalf Of Relationship Request

1. Open FINRA Gateway: https://gateway.finra.org

2. As the firm, select **Firm/Org** tab, enter your **User ID** and **Password**, read the **Entitlement Program Terms of Use** and click **Accept and Continue**.



3. Enter your **Security Answers** and click **Continue**.

4. Click **Continue to MFA.**

For more information on MFA, see the **MFA User Guide**.

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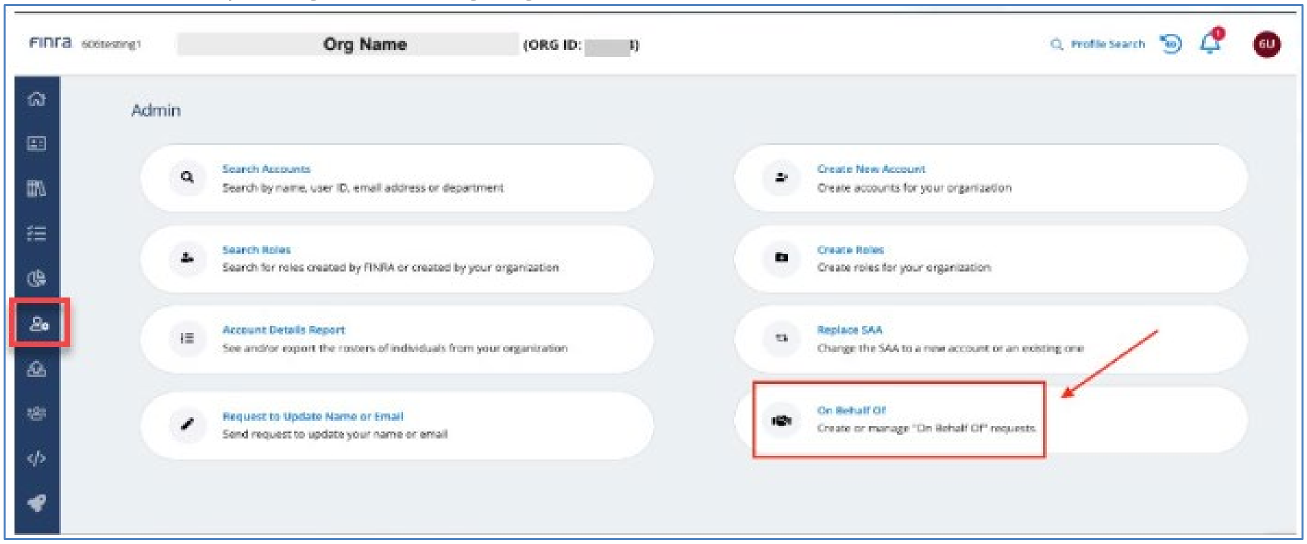
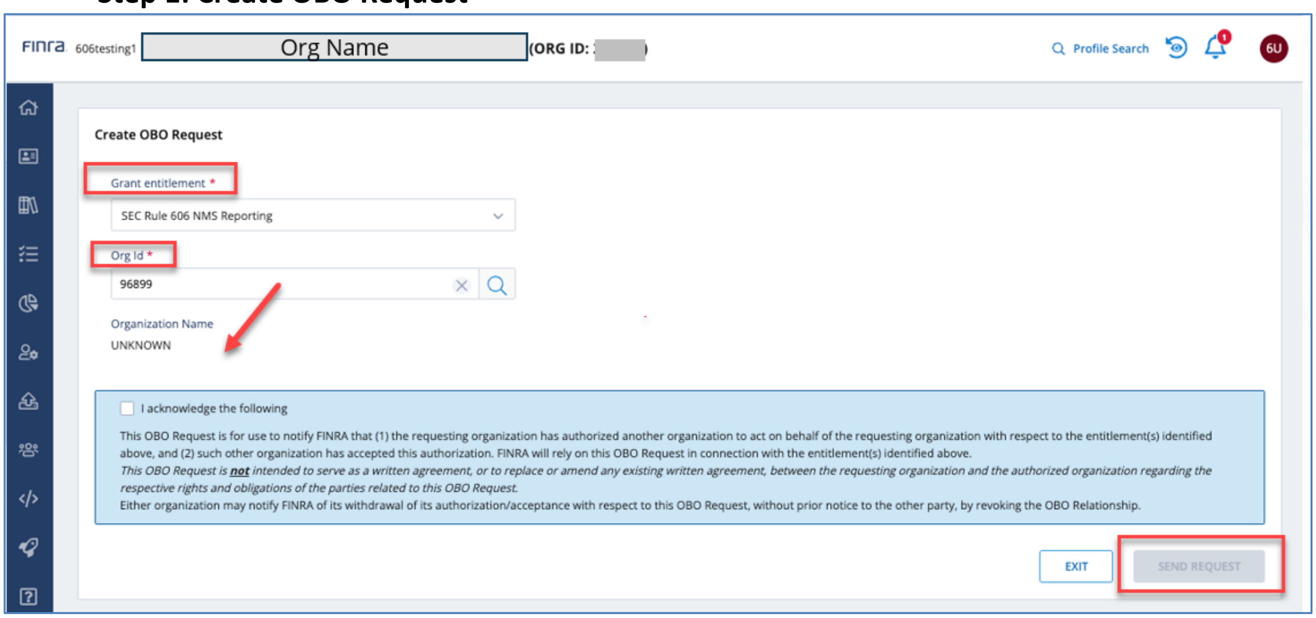
5. As the Firm SAA or submitter with required entitlement, select **Admin** from the landing page and click on the **On Behalf Of** bubble.

Required entitlements for Firms (Firm SAA or submitter):

- **Use** for ‘Create On Behalf of Relationship’
- **Admin** for the entitlement covered by the OBO Relationship (e.g., SEC Rule 606 NMS Reporting, Advertising Regulation File Transfer)



Step 1: Create OBO Request



1. As a Firm SAA or submitter with the required entitlement, you may create the OBO request with the vendor* and grant the specific entitlement needed for the OBO Relationship.
2. Enter the Org ID of the contracted vendor* with whom you want to establish an OBO Relationship. The Organization Name will display if the Org ID is tied to an active organization in the FINRA Entitlement Program. If the name does not populate, click **Exit** and the vendor* will need to work with entsupport@finra.org to establish an Org ID.
3. Read and acknowledge the OBO Statement associated with using the OBO Relationship workflow.

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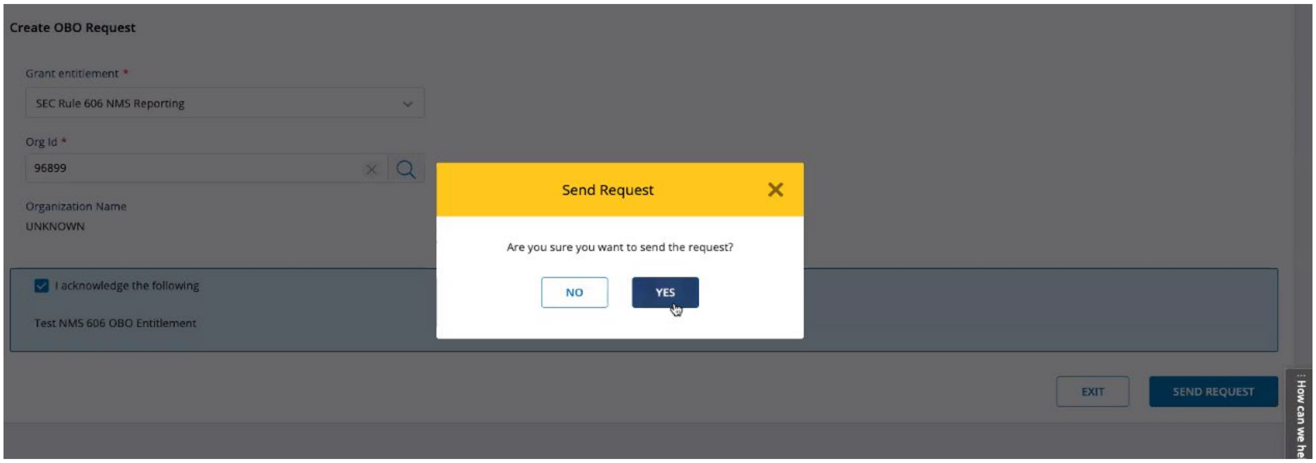
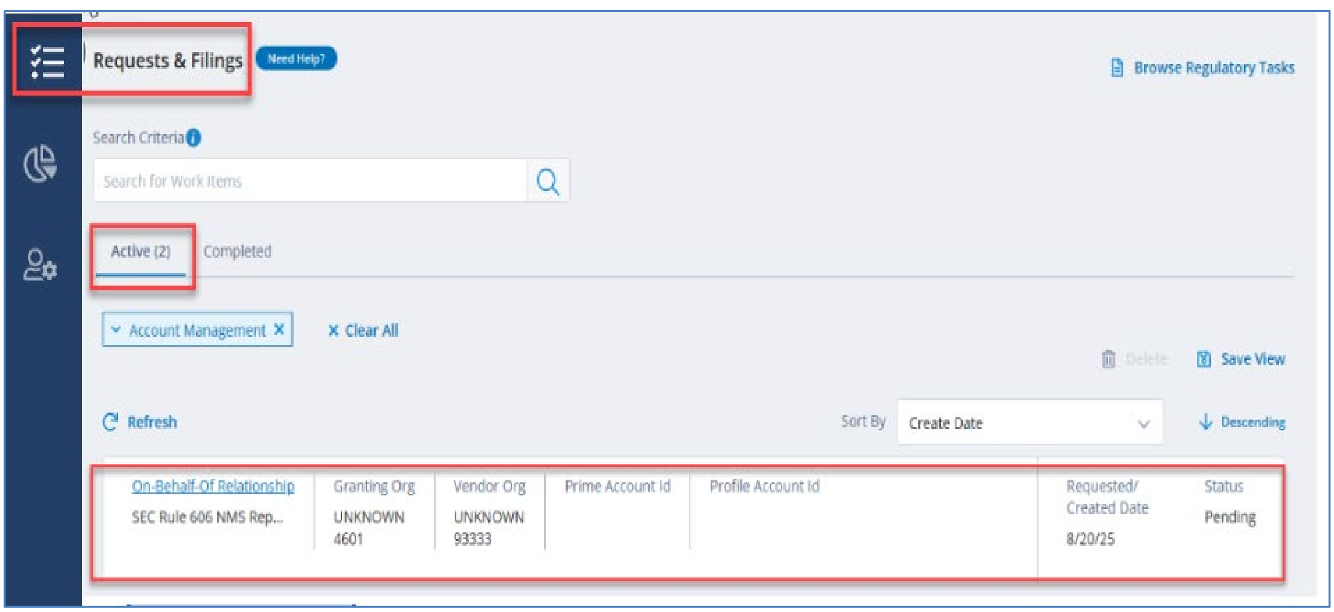
4. Click **Exit** or **Send Request** –
   - **Exit** (to decide later)
   - **Send Request** is enabled only when all required fields are completed.
     By selecting **Send Request**, the system displays a confirmation message. By selecting the 'Yes' option, it completes the 1st step in the workflow and the request is now pending review with the vendor*. An email will be sent to the CREP of the vendor* or SAA of the organization selected. By selecting the 'No' option, it will return you to the previous screen.



5. After selecting the 'Yes' option, the On Behalf Of Relationship will be displayed in a 'Pending' status in the Active section of Requests & Filings.



6. From Requests & Filings, select the On Behalf Of Relationship link to review the details of the relationship request.

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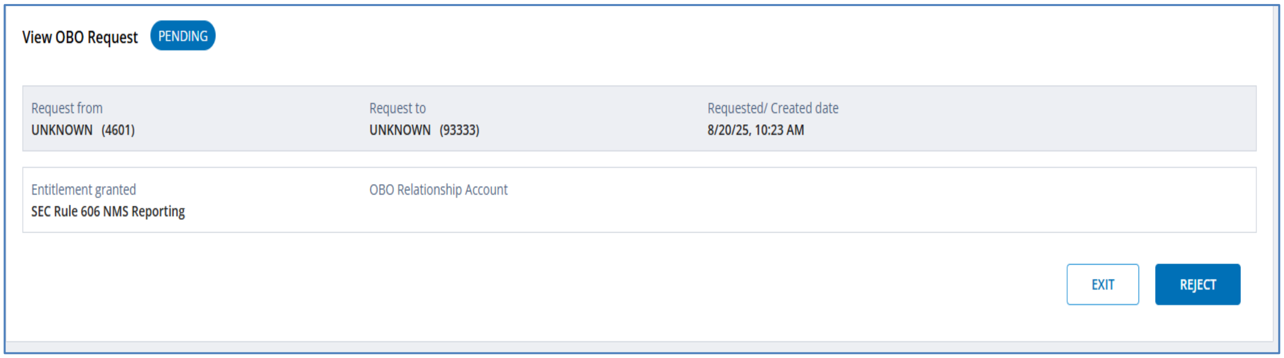
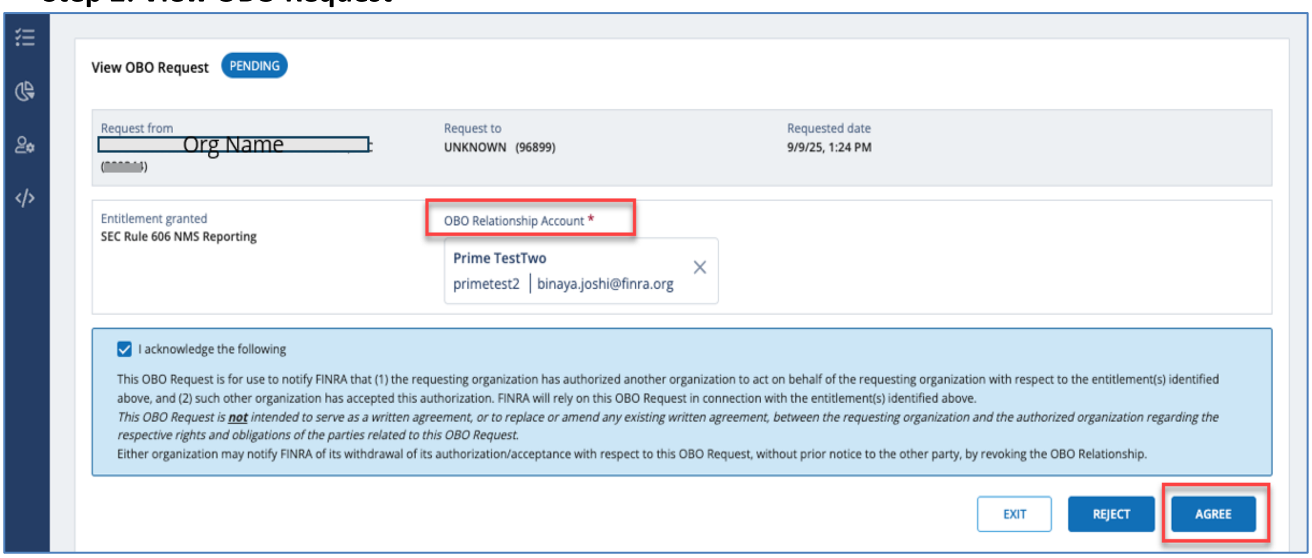
7. The workflow has been saved and is available for entitled users to **Exit** or **Reject** the relationship:
   - **Exit** (to decide later)
   - **Reject** closes the request and the request is no longer pending approval by the vendor*.



If no action is taken on the request within 30 days, the request will be closed due to inactivity and a new request will need to be submitted to establish an OBO Relationship.

Section 2: How to View & Agree an On Behalf Of Relationship Request

Step 2: View OBO Request



Required entitlements for Administrators (CREP/AA or SAA):

- **Use for** ‘Create On Behalf Of Relationship’

1. Once a firm submits a request to establish an OBO Relationship with the organization, an email is sent to the vendor* to review and finalize the relationship.
2. As a vendor* (CREP/AA or SAA) with the required entitlement, select the **View Access** button in the email received. Log in using User ID, Password and complete Multi-Factor Authentication (MFA). The system will direct you to the workflow where you are can view the submitted OBO Relationship request.
3. Review the content of the OBO Request to confirm the information is accurate.

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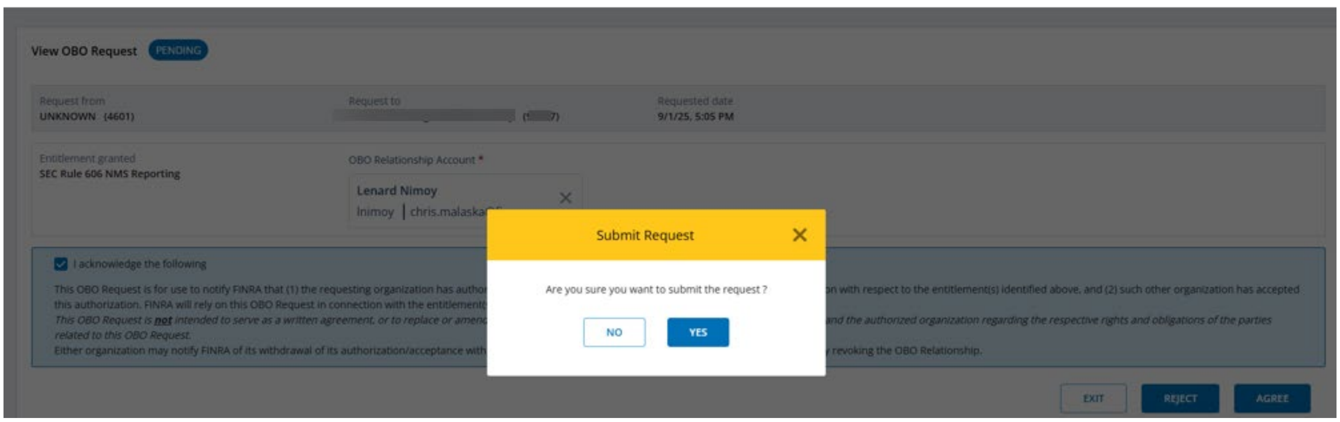
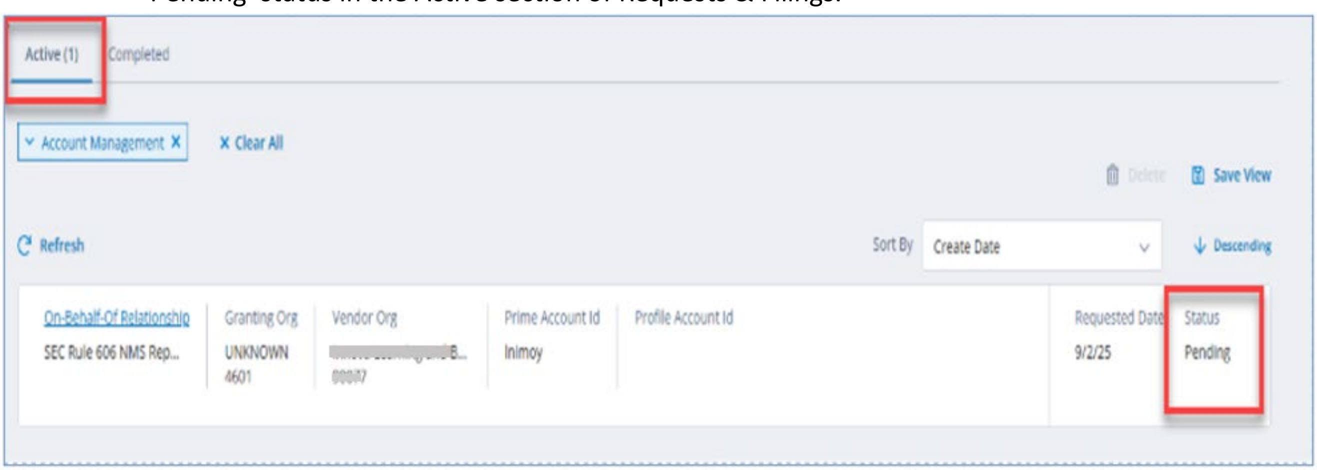
4. Enter the Prime account (human to human or machine to machine) that you want to do the OBO activities with and select from the drop-down list.

   The Prime account, new or existing, must be entitled with Use for 'Enable On Behalf Of' to be designated as an OBO account through the OBO Relationship workflow. If the account does not appear in the drop-down list after entering the account name, an account will need to be created by the vendor* with the required Enable On Behalf Of entitlement. See **Entitlement Reference Guide Section 6 - How to Create an Account.**
5. Review and acknowledge the OBO Statement regarding the use of the OBO Relationship.
6. Click **Exit**, **Reject** or **Agree.**
   - **Exit** (to decide later).
   - **Reject**, the system closes the request entirely and no further action is needed.
   - If you choose **Agree**, the system displays a confirmation message with 'Yes' and 'No' options. By selecting the 'Yes' option, it completes the 2nd step in the workflow and request is now Pending Review by the firm. An email is sent to the Firm SAA of the organization that created the OBO Relationship request (note – if creator of workflow is different than SAA, that user will not receive this email). By selecting 'No', the system takes the user back to the previous screen.



7. After selection of the 'Yes' option, the On Behalf of Relationship will be displayed for the vendor* in a 'Pending' status in the Active section of Requests & Filings.



8. Select the On Behalf Of Relationship link. Workflow is saved and available for review.

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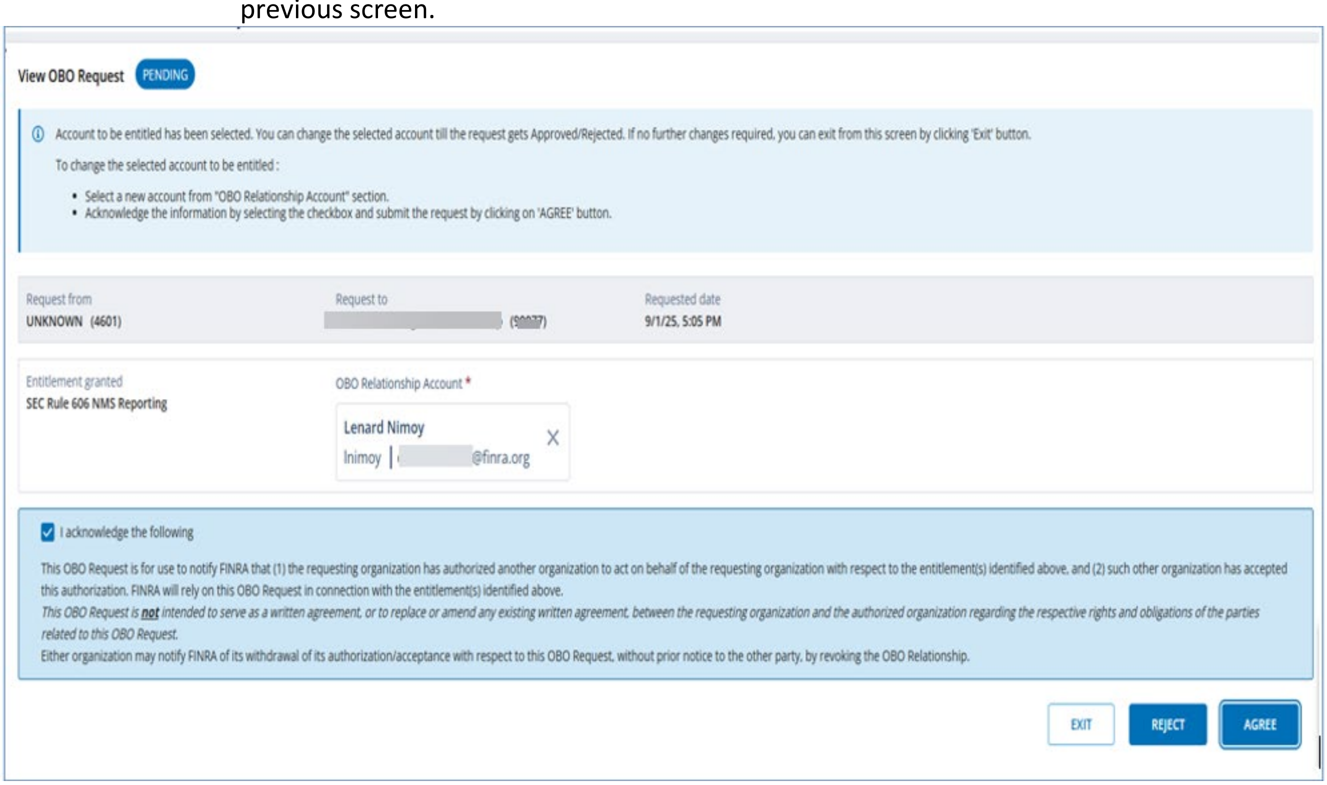
9. Click **Exit**, **Reject** or **Agree** to reconfirm or make changes to the relationship:
   - **Exit** (to decide later).
   - By selecting **Reject,** the system closes the request entirely and no further action is needed.
   - By selecting **Agree**, the system displays a confirmation message with 'Yes' and 'No' options. By selecting the 'Yes' option, the system completes the 2nd step in the workflow and the request is now Pending Review by the firm. An email is sent to the Firm SAA of the organization that created the OBO Relationship request (note – if creator of workflow is different than SAA, that user will not receive this email). By selecting 'No', the system takes the user back to the previous screen.



If no action is taken on the request within 30 days, the request will be closed due to inactivity and a new request will need to be submitted to establish an OBO Relationship.

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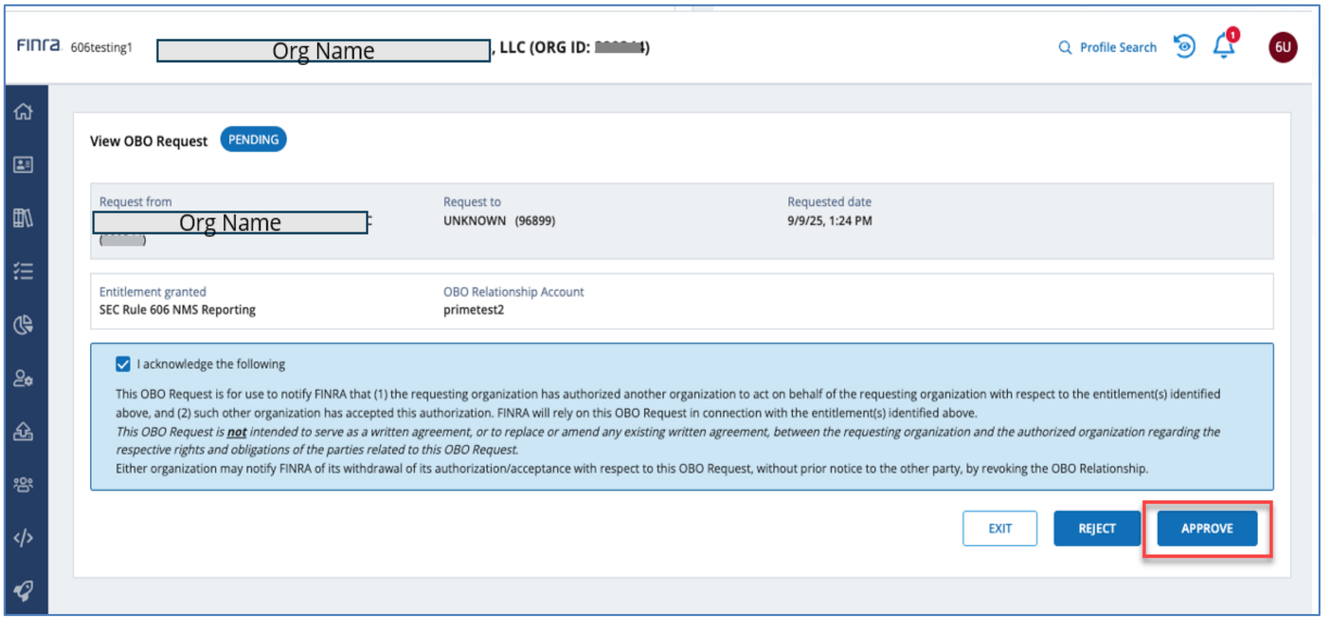
Section 3: How to Approve & Finalize an On Behalf Of Relationship Request

Step 3: View & Approve OBO Request



Required entitlements for Administrators (Firm SAA and Submitter):

- **Use** for 'Create On Behalf of Relationship'
- **Admin** for entitlement (e.g., SEC Rule 606 NMS Reporting, Advertising Regulation File Transfer)

An email has been sent back to the Firm SAA and submitter and is now available to review the On Behalf Of request.

1. Firm (SAA, submitter), with required entitlement, selects the **View Access** button in the received email, logs in w/MFA which will take you directly to the workflow where you are able to review and Approve the OBO Relationship; or
2. Navigate to Requests and Filing > Active Tab > Request created for your vendor*.
   - Review the content of the OBO Request to confirm information is accurate.
   - Acknowledge the OBO Statement.
3. Click **Exit**, **Reject** or **Approve**.
   - **Exit** (to decide later).
   - By selecting **Reject**, the system closes the request entirely and no further action is needed.
   - By selecting **Approve**, the system displays a confirmation message with 'Yes' and 'No' options. By selecting 'Yes', the system completes the 3rd workflow step and automatically sends confirmation emails to the Firm SAA of the organization who initiated the OBO Relationship request and the vendor/CREP or organization/SAA who accepted the relationship request. These emails confirm the OBO Relationship has been approved and is active.

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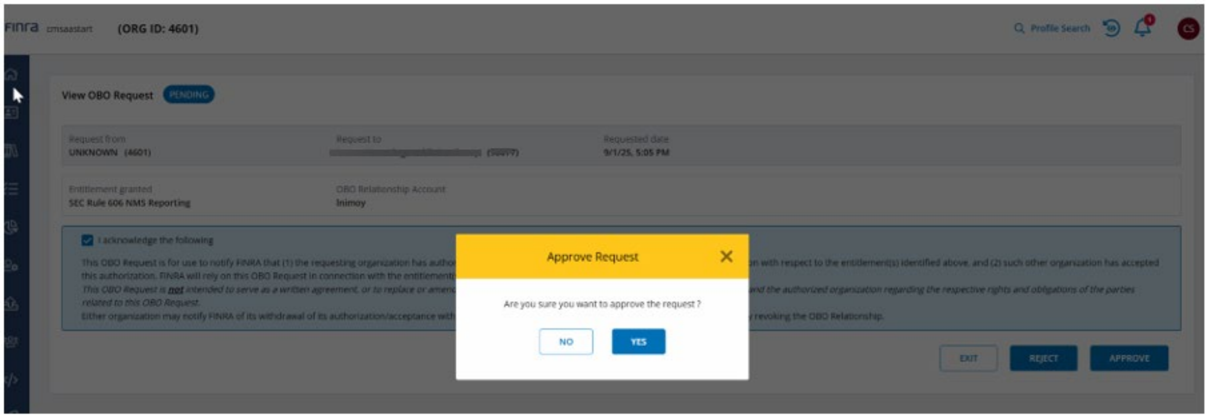
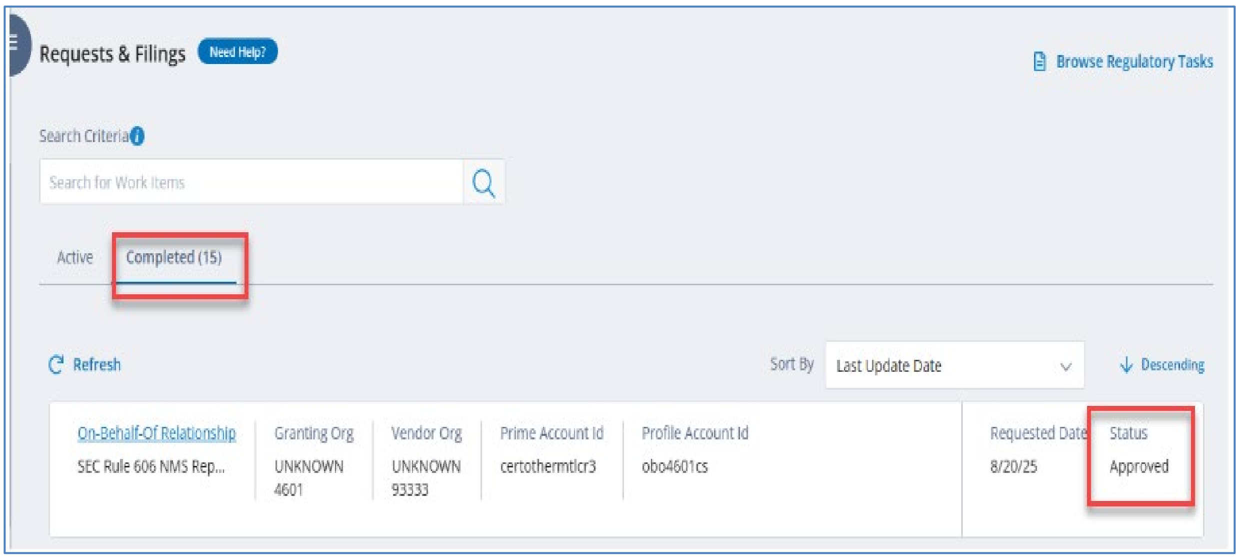
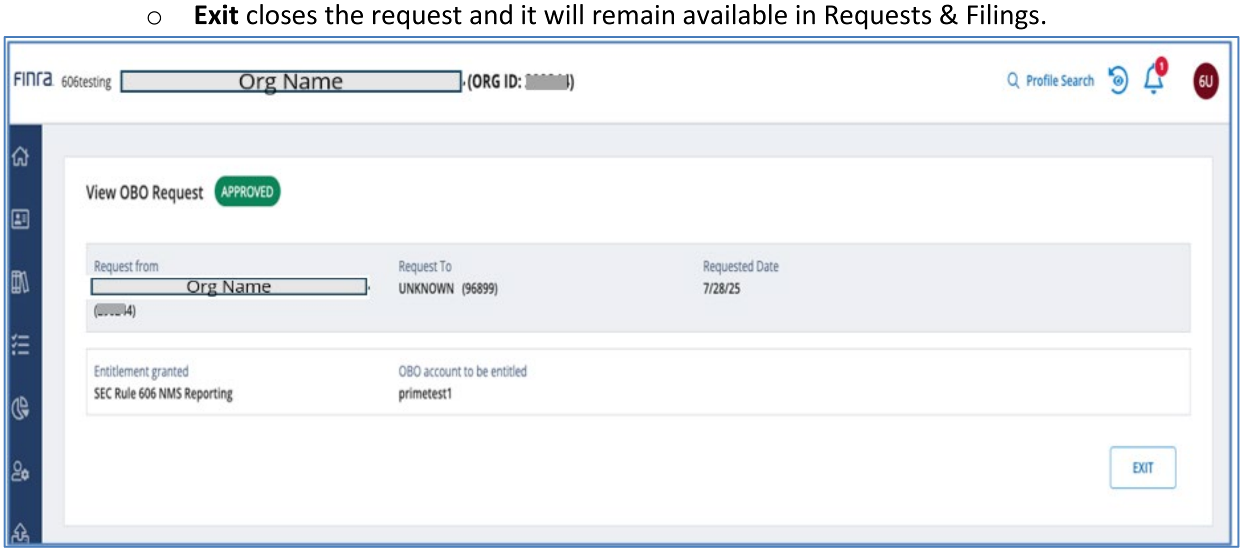


4. After selection of the ‘Yes’ option, the On Behalf of Relationship will be displayed for the firm in an ‘Approved’ status in the Completed section of Requests & Filings.



5. Select the On Behalf Of Relationship link. Workflow has been saved and available to **Exit** the relationship:
   - **Exit** closes the request and it will remain available in Requests & Filings.



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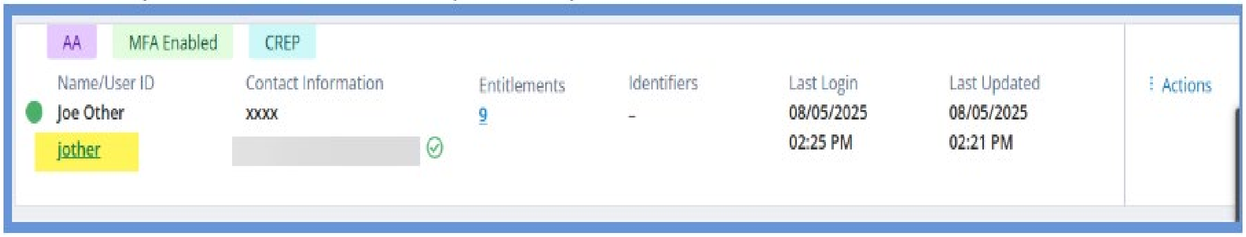
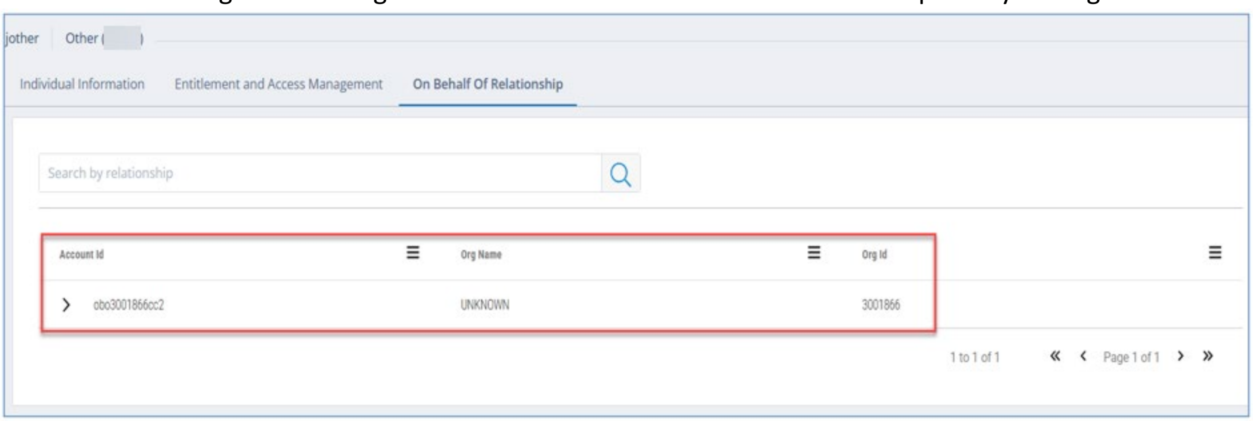
Section 4: How to View Completed OBO Relationships

1. From your account information, click on your User ID.

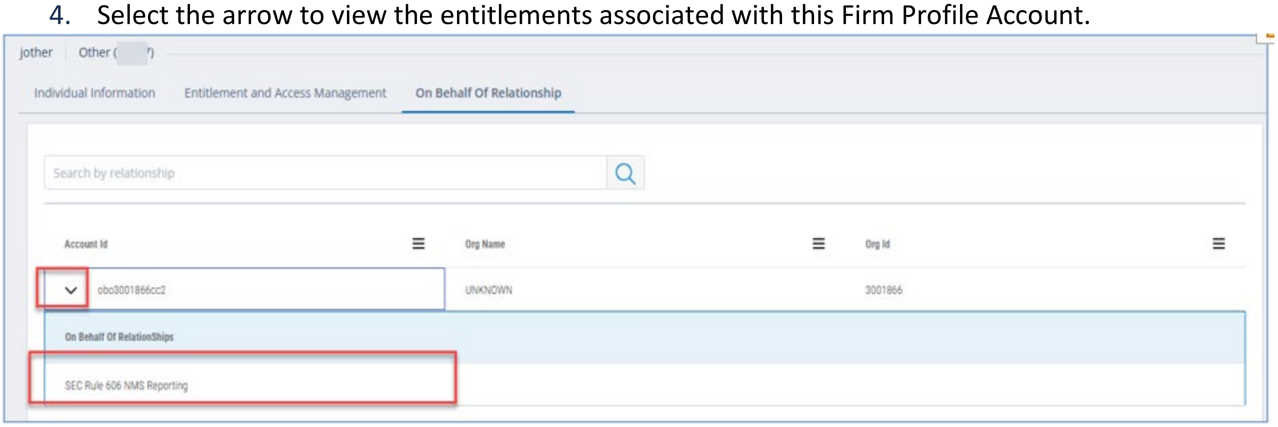


2. You will see a new link 'On Behalf of Relationship'. Click on this link to see your account's OBO Relationship information.

3. You will be presented with all the OBO Relationships that have been created and are associated to that account.
   - Account ID = Firm Profile Account
   - Org Name & Org ID = Firm that has an active OBO Relationship with your organization.



4. Select the arrow to view the entitlements associated with this Firm Profile Account.



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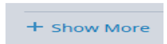
Section 5: How to Filter On Behalf Of Relationships?

Firm View

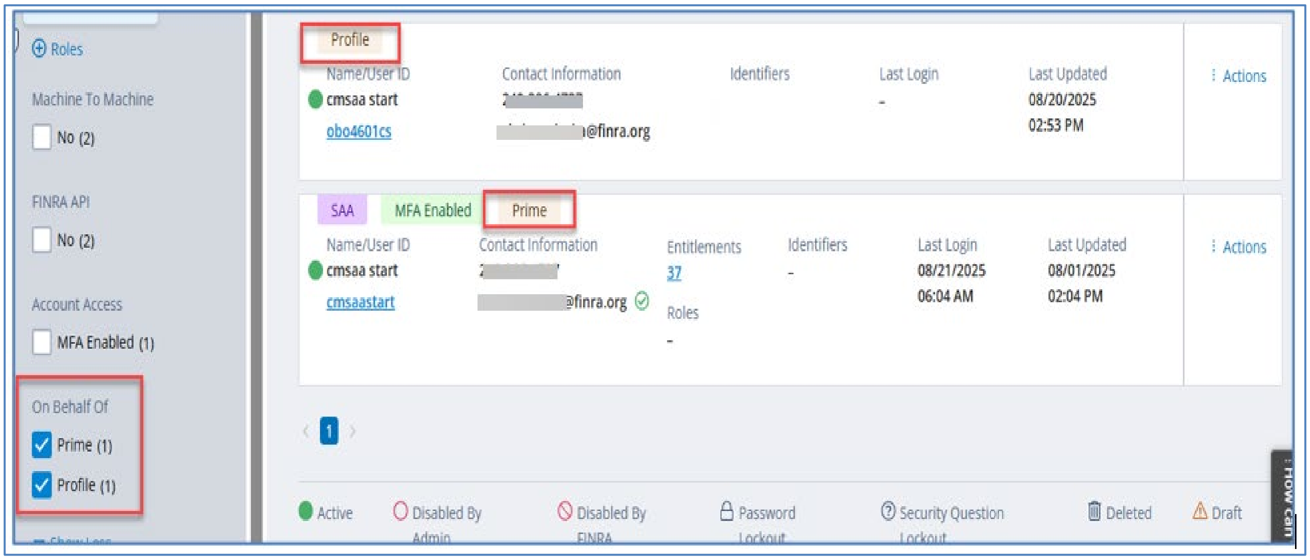
1. As a firm Super Account Administrator or Administrator entitled to Account Management, you can use the left navigation panel available through Account Management to filter for your Prime and Profile accounts:

   The following filter, under 

is presented to assist you in searching for your OBO accounts:

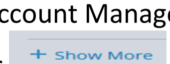
   On Behalf Of

   - Prime
   - Profile



Vendor*View

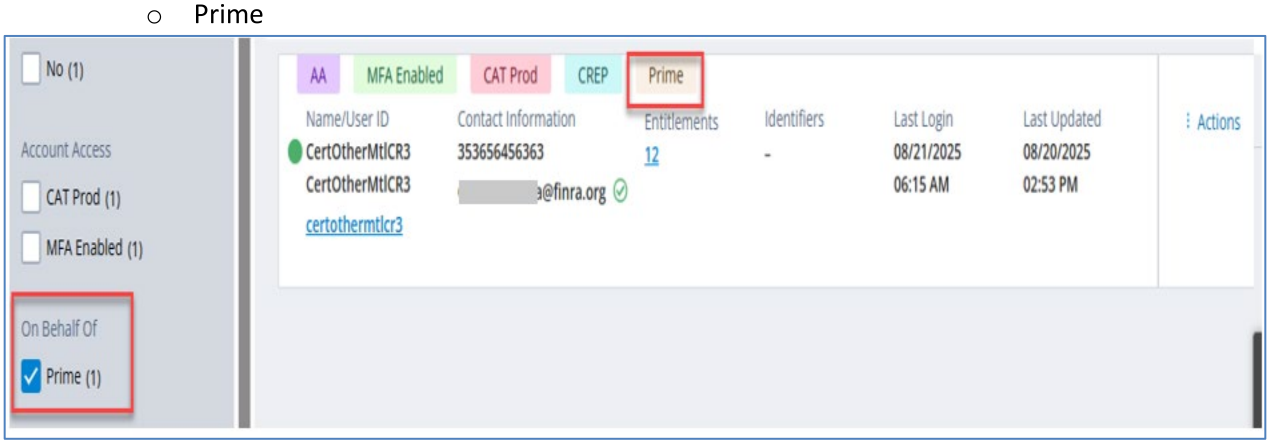
1. As a vendor* Account Administrator entitled to Account Management, you can use the left navigation panel available through Account Management to filter for your Prime accounts:

   The following filter, under 

is presented to assist you in searching for your OBO accounts:

   On Behalf Of

   - Prime



NOTE: Filters are dynamic and will show only when applicable. To remove all filters, click on Clear Filters at the bottom of the left-hand menu.

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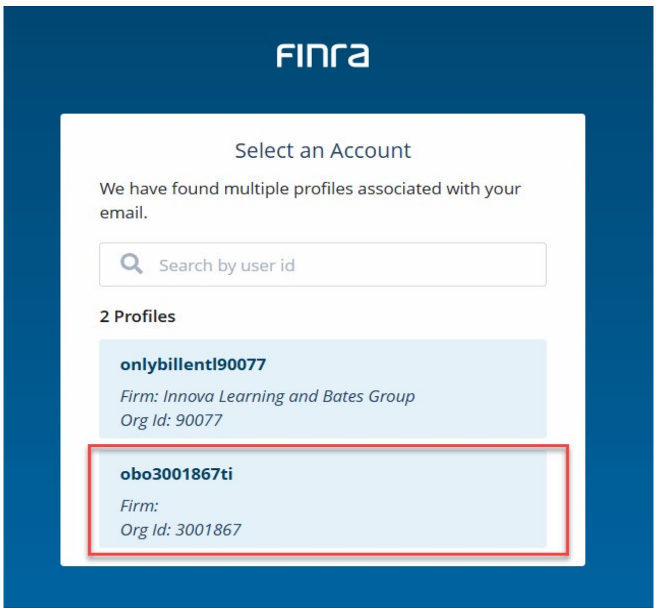
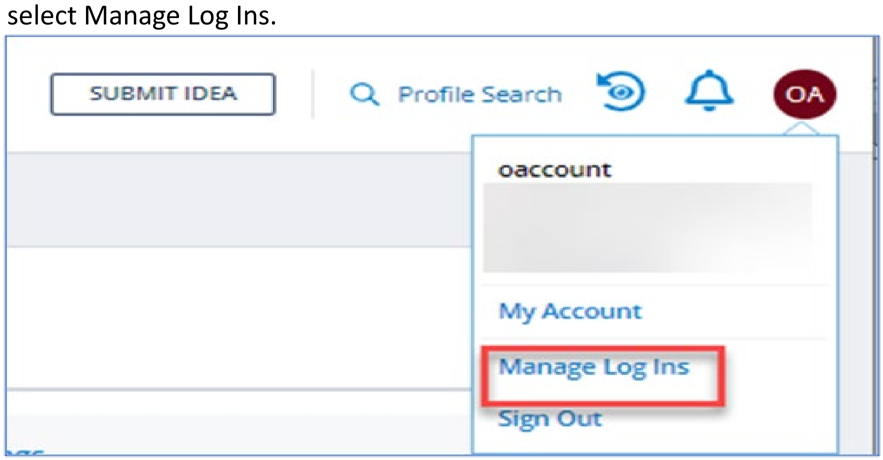
Section 6: How to Switch Between Accounts?

1. After you login into your vendor* (Prime) account to perform OBO activities, select the OBO Firm (Profile) account (starts with obo...) of the firm you are providing activities for on their behalf.

Note: you will need to complete MFA each time you switch a firm's Profile account to perform OBO activities. For Prime accounts that are performing OBO activities for multiple firm Profile accounts, users may want to consider using a security key to complete MFA. For more information on MFA, see the **MFA User Guide**.



2. To switch back to your vendor* account, click on your User Profile again in the upper right-hand corner and select Manage Log Ins.



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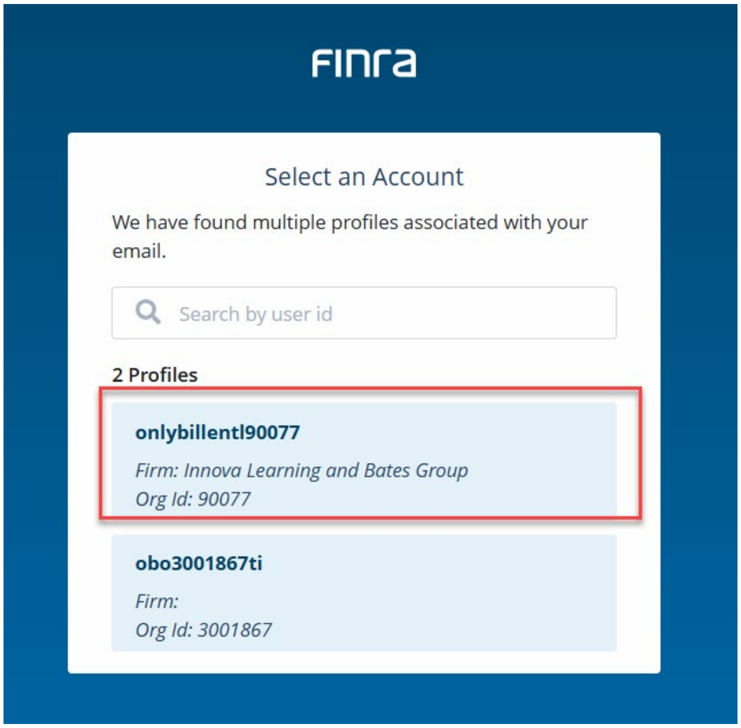
3. Select your account. Continue with MFA and you will be directed back to FINRA Gateway.



- **Security Note:** For your protection and compliance requirements, all accounts must complete MFA when logging in or when switching accounts to perform OBO activities.

Need Help?

If you need assistance with On Behalf Of (OBO), contact the FINRA Support Center at (800)-321-6273.

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