

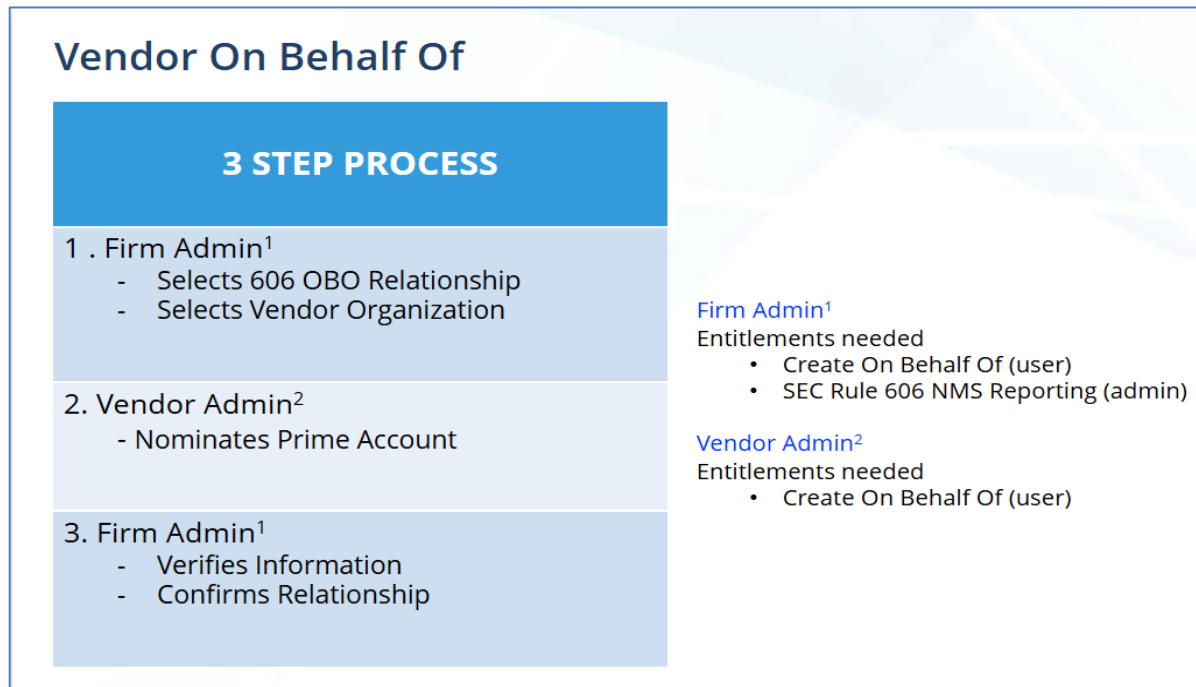
## On Behalf Of (OBO) Guide

9/28/2025

Effective October 1, 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, one application is participating in the initial launch 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

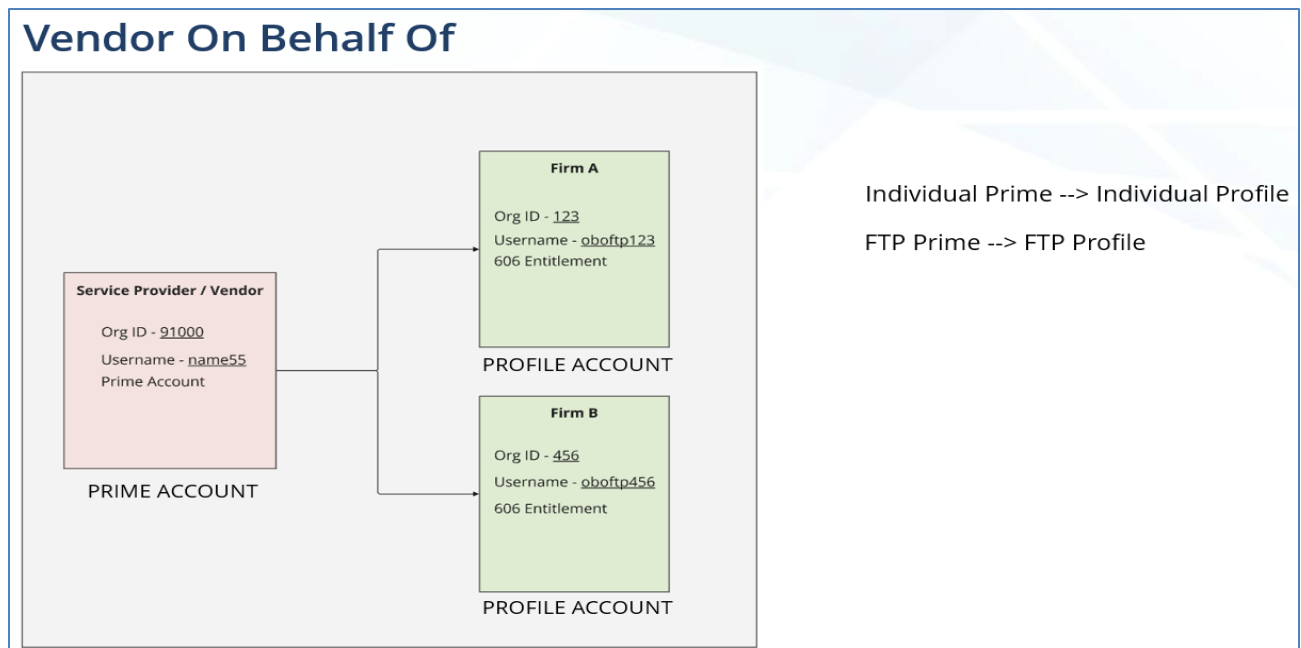
- The 3-step online workflow process will enable a firm to create an OBO Relationship with a vendor\*. The workflow guides the requester and recipient step-by-step through the process. Requests will process automatically once approved by each organization through the workflow.



- 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.



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

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.](#)

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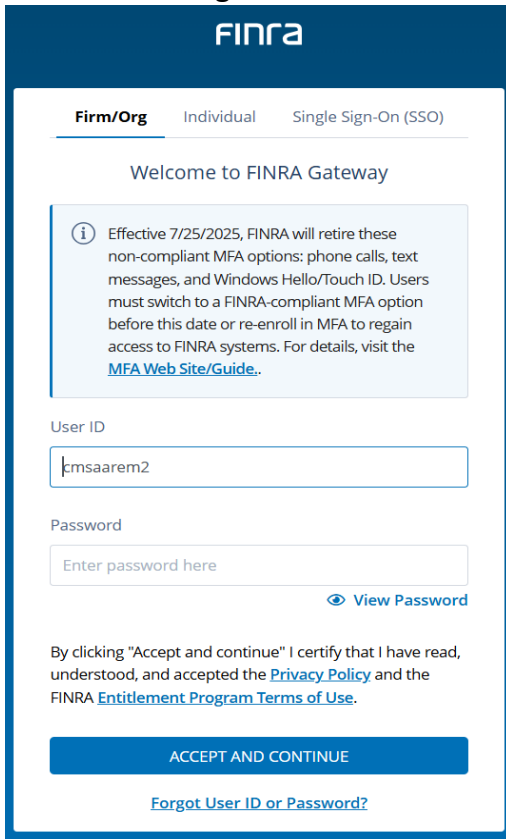
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### **Current FINRA Systems eligible for On Behalf Of (OBO)**

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.](#)

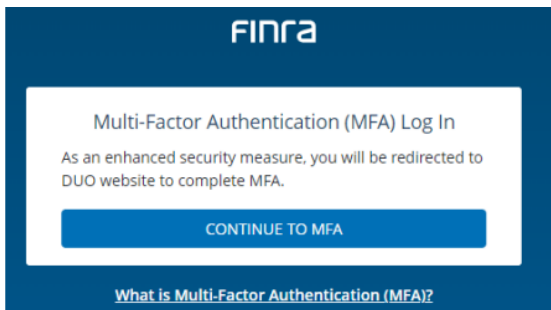
## Section 1: How to Create an On Behalf Of Relationship Request

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**.



The screenshot shows the FINRA Gateway login interface. At the top, the FINRA logo is displayed. Below it, there are three tabs: "Firm/Org" (selected), "Individual", and "Single Sign-On (SSO)". A welcome message reads "Welcome to FINRA Gateway". A light blue information box contains a notice: "Effective 7/25/2025, FINRA will retire these non-compliant MFA options: phone calls, text messages, and Windows Hello/Touch ID. Users must switch to a FINRA-compliant MFA option before this date or re-enroll in MFA to regain access to FINRA systems. For details, visit the [MFA Web Site/Guide](#)." Below this, there are input fields for "User ID" (containing "kmsaarem2") and "Password" (with placeholder text "Enter password here"). A "View Password" link is visible next to the password field. A confirmation statement reads: "By clicking 'Accept and continue' I certify that I have read, understood, and accepted the [Privacy Policy](#) and the FINRA [Entitlement Program Terms of Use](#)." At the bottom, there is a blue button labeled "ACCEPT AND CONTINUE" and a link for "Forgot User ID or Password?".

3. Enter your **Security Answers** and click **Continue**.
4. Click **Continue to MFA**.



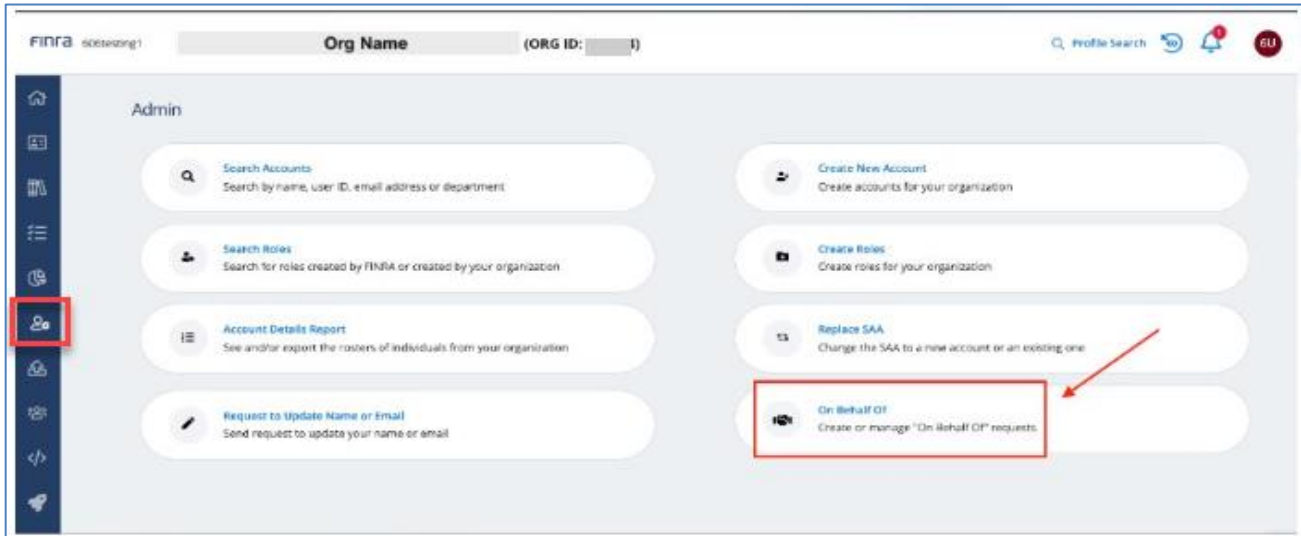
The screenshot shows the "Multi-Factor Authentication (MFA) Log In" screen. It features the FINRA logo at the top. The main heading is "Multi-Factor Authentication (MFA) Log In". Below this, a message states: "As an enhanced security measure, you will be redirected to DUO website to complete MFA." A blue button labeled "CONTINUE TO MFA" is centered on the page. At the bottom, there is a link for "What is Multi-Factor Authentication (MFA)?".

For more information on MFA, see the [MFA User Guide](#).

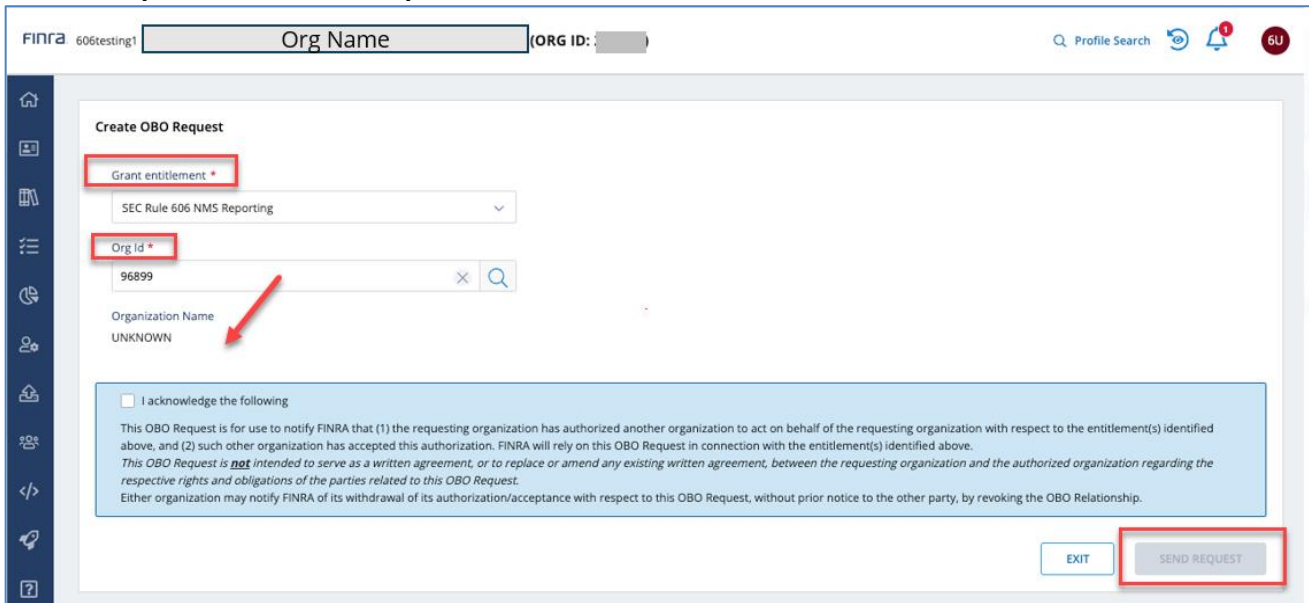
- As the Firm SAA or submitter with required entitlement, select **Admin** from the landing page and click on the **On Behalf Of** bubble.

**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)



**Step 1: Create OBO Request**



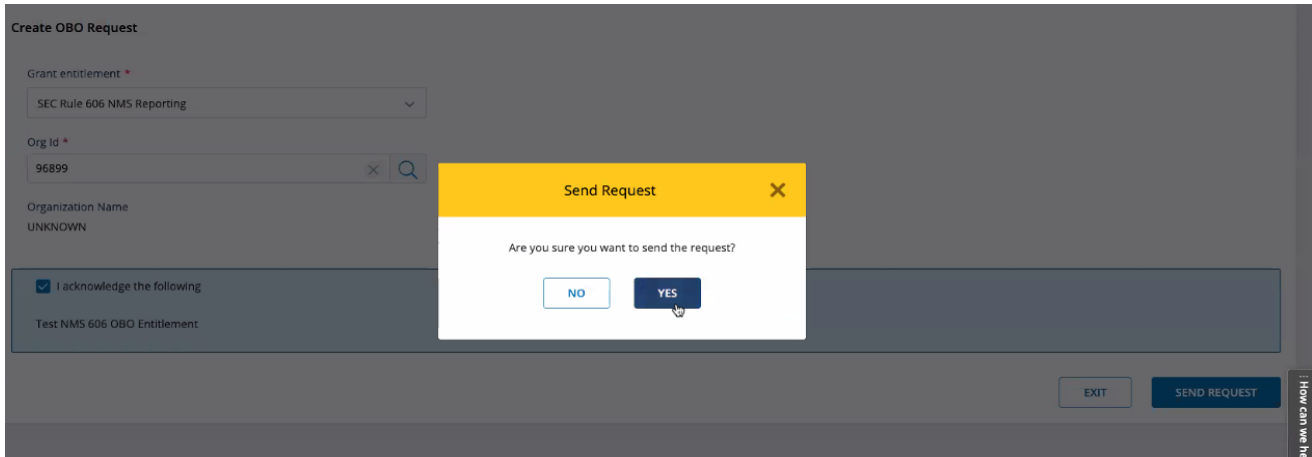
- As a Firm SAA or submitter with the required entitlement, you may create the OBO request with the vendor\* and grant the specific entitlement needed for the OBO Relationship.
- Enter the Org ID of the contracted vendor\* with whom you want to establish an OBO Relationship. The Organization Name will 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](mailto:entsupport@finra.org) to establish an Org ID.
- Read and acknowledge the OBO Statement associated with using the OBO Relationship workflow.

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

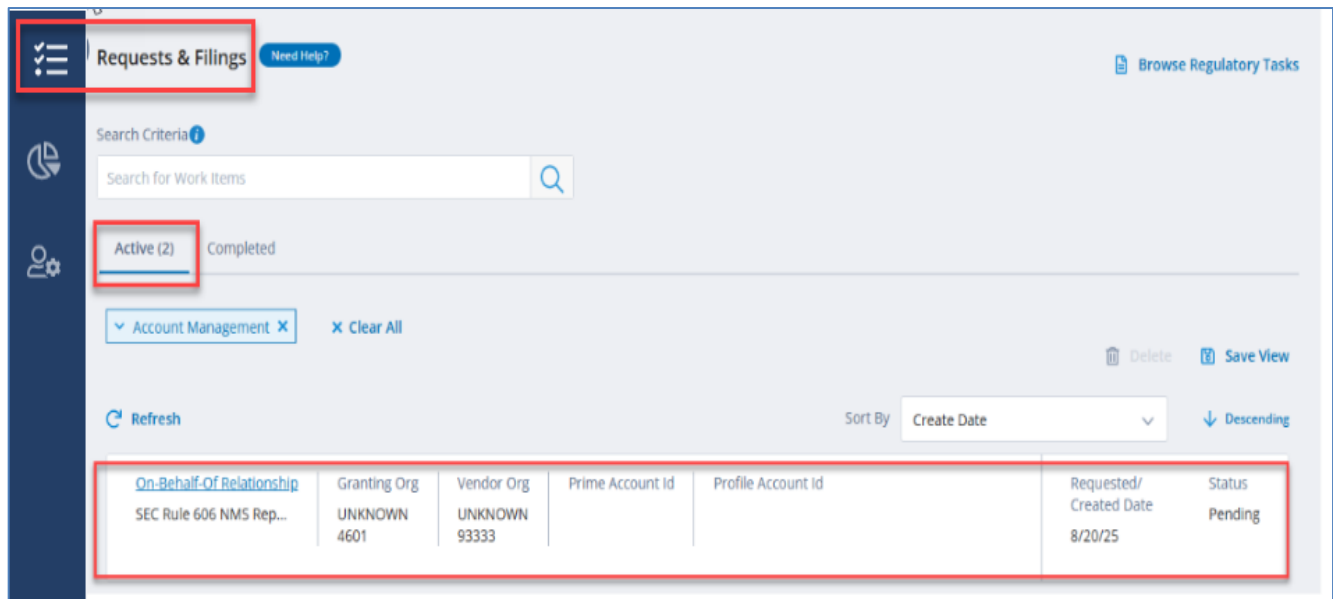
4. Click **Exit** or **Send Request** –

- **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 1<sup>st</sup> 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.

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

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):

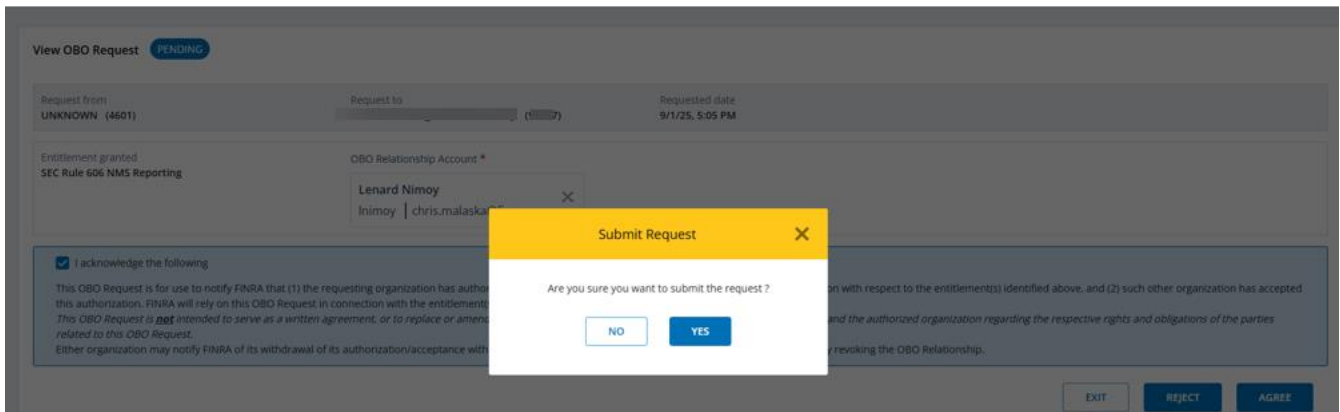
- Use for 'Create On Behalf Of Relationship'
1. Once a firm submits a request to establish an OBO Relationship with the organization, an email is sent to the vendor\* to review and finalize the relationship.
  2. As a vendor\* (CREP/AA or SAA) with the required entitlement, select the **View Access** 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.

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

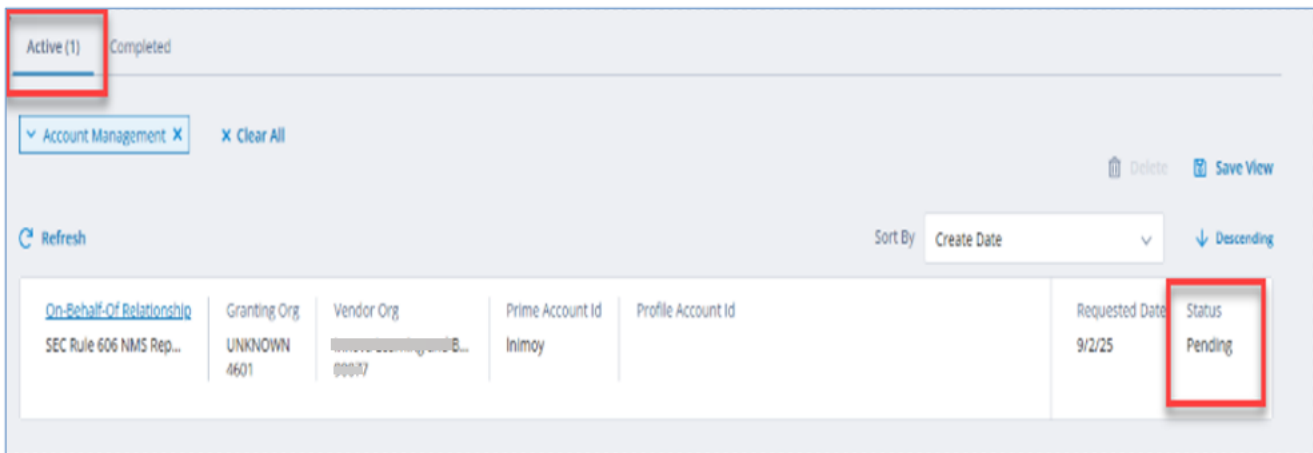
4. Enter the Prime account (human to human or machine to machine) that you want to do the OBO activities with and select from the drop-down list.

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**.
  - o **Exit** (to decide later).
  - o **Reject**, the system closes the request entirely and no further action is needed.
  - o If you choose **Agree**, the system displays a confirmation message with 'Yes' and 'No' options. By selecting the 'Yes' option, it completes the 2<sup>nd</sup> 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.

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

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 2<sup>nd</sup> 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.

View OBO Request
PENDING

i Account to be entitled has been selected. You can change the selected account till the request gets Approved/Rejected. If no further changes required, you can exit from this screen by clicking 'Exit' button.

To change the selected account to be entitled :

- Select a new account from "OBO Relationship Account" section.
- Acknowledge the information by selecting the checkbox and submit the request by clicking on 'AGREE' button.

Request from	Request to	Requested date
UNKNOWN (4601)	[REDACTED] (50037)	9/1/25, 5:05 PM

Entitlement granted  
SEC Rule 606 NMS Reporting

OBO Relationship Account \*

Lenard Nimoy X

Inimoy | [REDACTED]@finra.org

I acknowledge the following

This OBO Request is for use to notify FINRA that (1) the requesting organization has authorized another organization to act on behalf of the requesting organization with respect to the entitlement(s) identified above, and (2) such other organization has accepted this authorization. FINRA will rely on this OBO Request in connection with the entitlement(s) identified above.

*This OBO Request is **not** intended to serve as a written agreement, or to replace or amend any existing written agreement, between the requesting organization and the authorized organization regarding the respective rights and obligations of the parties related to this OBO Request.*

Either organization may notify FINRA of its withdrawal of its authorization/acceptance with respect to this OBO Request, without prior notice to the other party, by revoking the OBO Relationship.

EXIT
REJECT
AGREE

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

### Step 3: View & Approve OBO Request

FINRA 606testing1 [Org Name] LLC (ORG ID: [REDACTED]) Profile Search [6U]

View OBO Request **PENDING**

Request from	Request to	Requested date
[Org Name]	UNKNOWN (96899)	9/9/25, 1:24 PM

Entitlement granted	OBO Relationship Account
SEC Rule 606 NMS Reporting	primetest2

I acknowledge the following

This OBO Request is for use to notify FINRA that (1) the requesting organization has authorized another organization to act on behalf of the requesting organization with respect to the entitlement(s) identified above, and (2) such other organization has accepted this authorization. FINRA will rely on this OBO Request in connection with the entitlement(s) identified above. This OBO Request is **not** intended to serve as a written agreement, or to replace or amend any existing written agreement, between the requesting organization and the authorized organization regarding the respective rights and obligations of the parties related to this OBO Request. Either organization may notify FINRA of its withdrawal of its authorization/acceptance with respect to this OBO Request, without prior notice to the other party, by revoking the OBO Relationship.

EXIT REJECT **APPROVE**

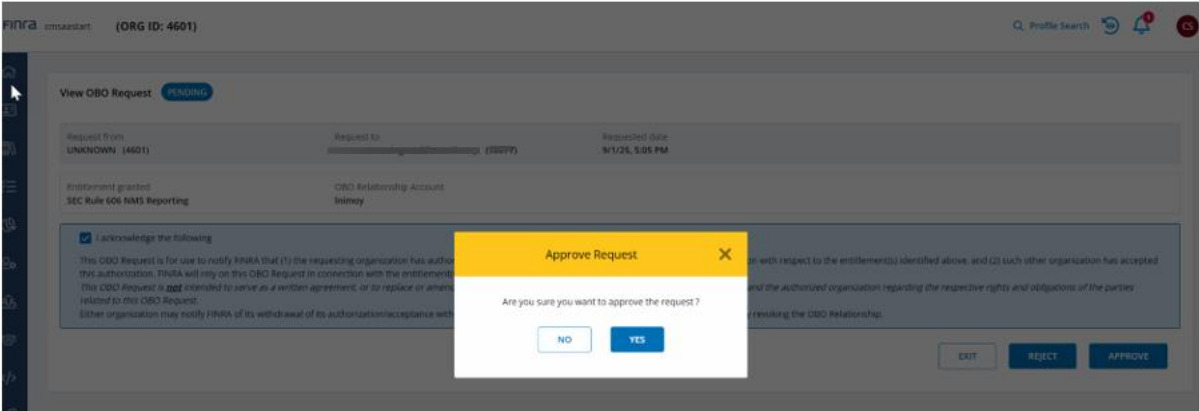
#### Required entitlements for Administrators (Firm SAA and Submitter):

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

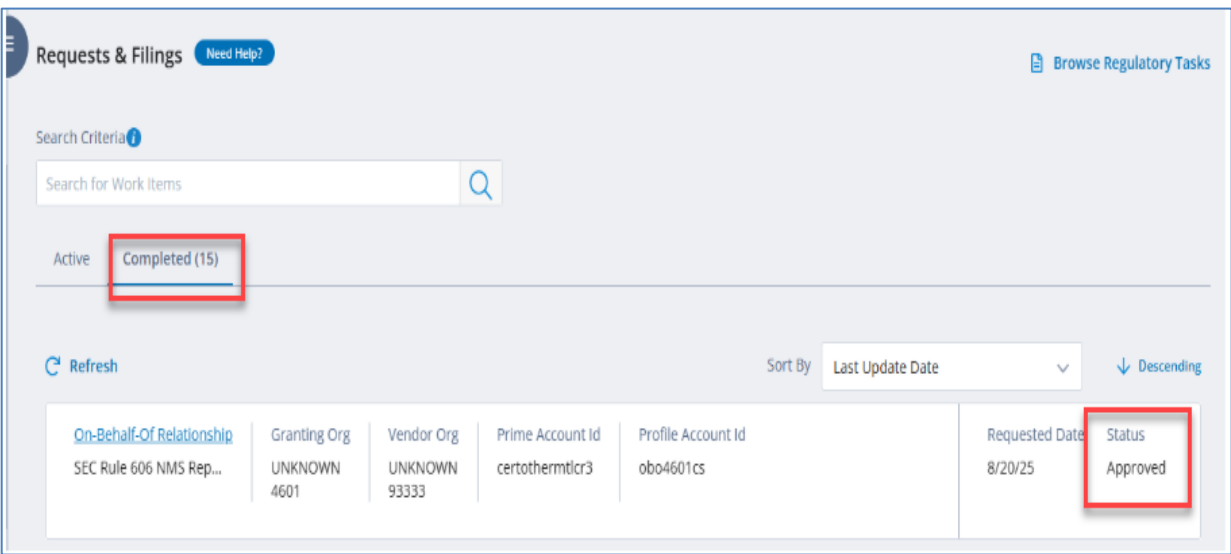
An email has been sent back to the Firm SAA and submitter and is now available to review the On Behalf Of request.

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.

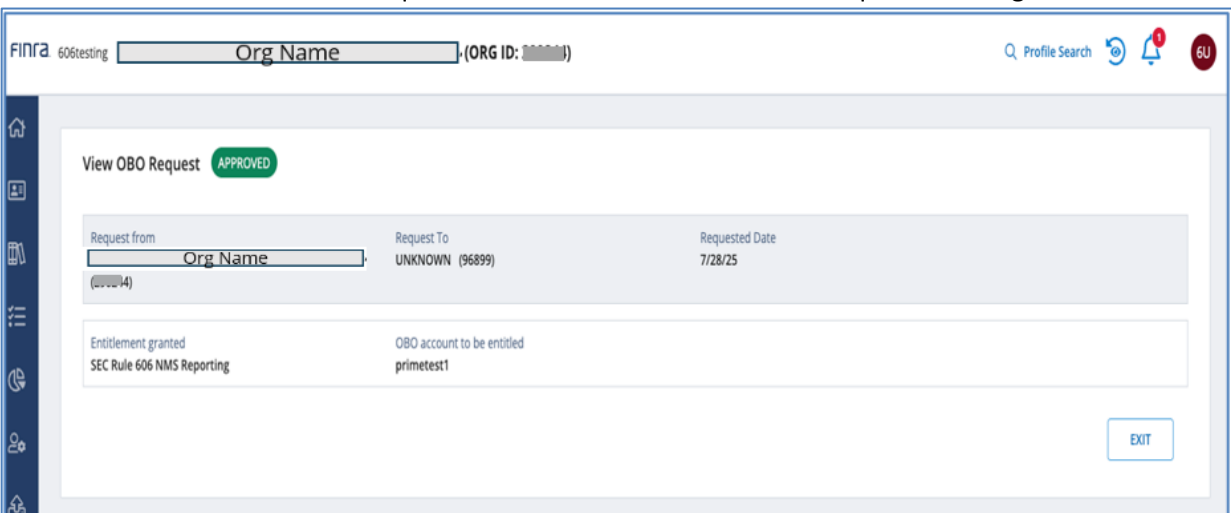
\*Vendor = Service Provider or organization working on behalf of other firms.



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.



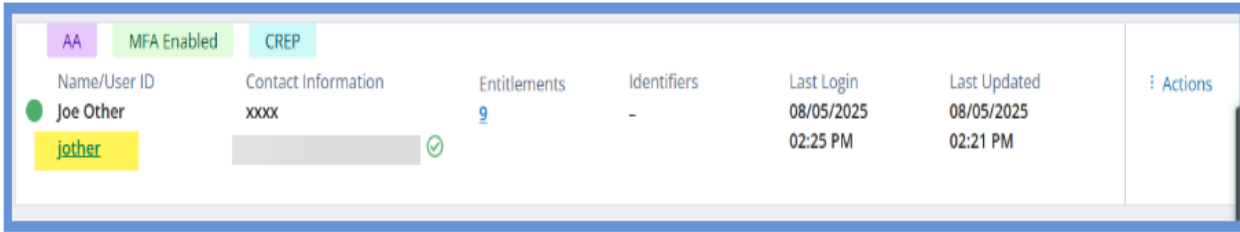
5. Select the On Behalf Of Relationship link. Workflow has been saved and available to **Exit** the relationship:
  - o **Exit** closes the request and it will remain available in Requests & Filings.



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

## Section 4: How to View Completed OBO Relationships

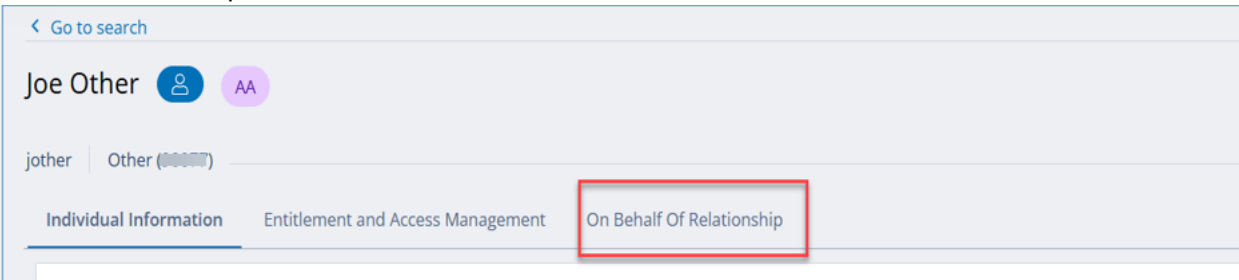
1. From your account information, click on your User ID.



A screenshot of a user profile page. At the top, there are three status tags: 'AA' (purple), 'MFA Enabled' (green), and 'CREP' (teal). Below these are columns for 'Name/User ID', 'Contact Information', 'Entitlements', 'Identifiers', 'Last Login', and 'Last Updated'. The user's name is 'Joe Other' with a green profile icon. The contact information shows 'xxxx' and a greyed-out field with a green checkmark. The 'Entitlements' column shows a '9' and the 'Last Updated' column shows '08/05/2025 02:21 PM'. An 'Actions' menu is visible on the right.

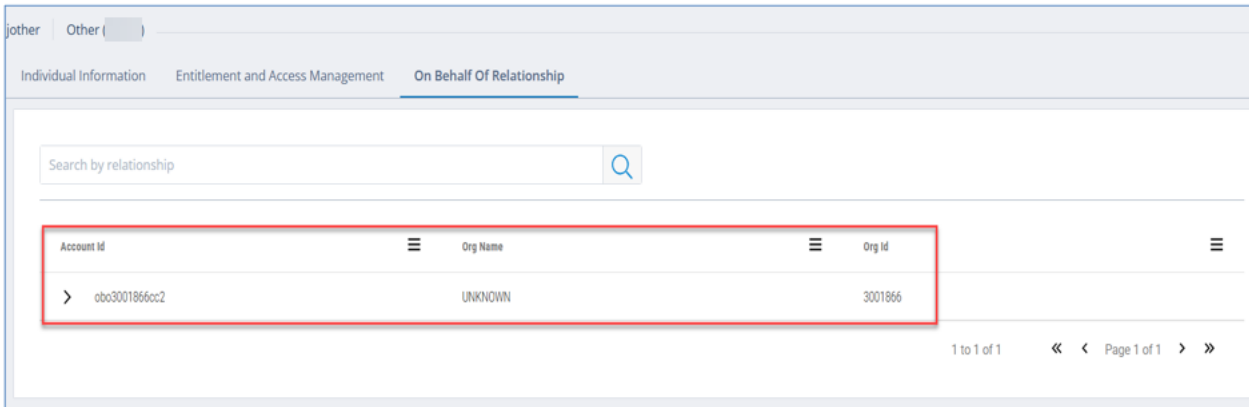
Name/User ID	Contact Information	Entitlements	Identifiers	Last Login	Last Updated	Actions
Joe Other	xxxx	9	-	08/05/2025 02:25 PM	08/05/2025 02:21 PM	

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



A screenshot of the user profile page showing navigation tabs. The tabs are 'Individual Information', 'Entitlement and Access Management', and 'On Behalf Of Relationship'. The 'On Behalf Of Relationship' tab is highlighted with a red box. The user's name 'Joe Other' and a search bar are visible at the top.

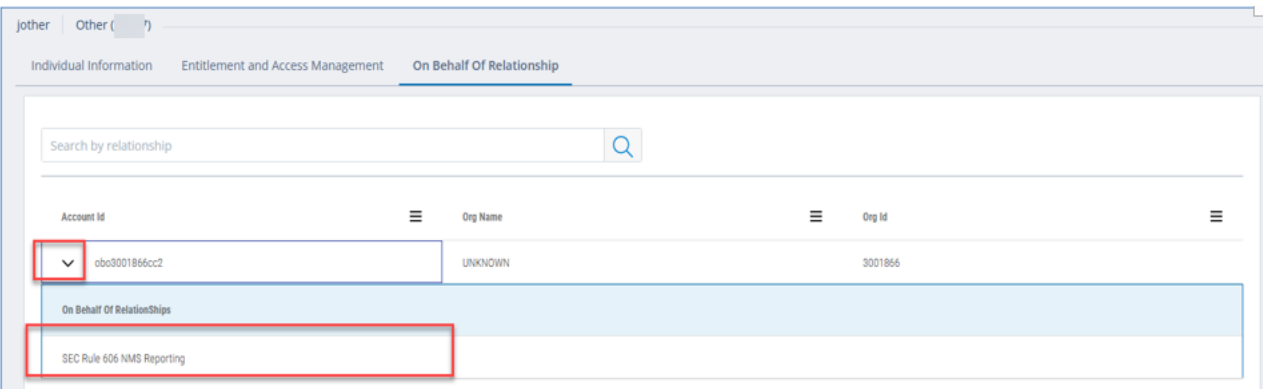
3. You will be presented with all the OBO Relationships that have been created and are associated to that account.
  - Account ID = Firm Profile Account
  - Org Name & Org ID = Firm that has an active OBO Relationship with your organization.



A screenshot of the 'On Behalf Of Relationship' page. It features a search bar and a table with columns for 'Account Id', 'Org Name', and 'Org Id'. A single row is visible, with 'obo3001866cc2' in the 'Account Id' column, 'UNKNOWN' in the 'Org Name' column, and '3001866' in the 'Org Id' column. A red box highlights this row. The page shows '1 to 1 of 1' results.

Account Id	Org Name	Org Id
obo3001866cc2	UNKNOWN	3001866

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



A screenshot of the 'On Behalf Of Relationship' page showing details for the selected relationship. A dropdown arrow next to the 'Account Id' 'obo3001866cc2' is highlighted with a red box. Below the table, a section titled 'On Behalf Of Relationships' contains a list of entitlements, with 'SEC Rule 606 NMS Reporting' highlighted by a red box.

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

## 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 [+ Show More](#) is presented to assist you in searching for your OBO accounts:  
**On Behalf Of**

- Prime
- Profile

The screenshot shows the 'Firm View' interface. On the left, there is a navigation panel with several filter sections: 'Machine To Machine' (No (2)), 'FINRA API' (No (2)), 'Account Access' (MFA Enabled (1)), and 'On Behalf Of' (Prime (1), Profile (1)). The 'On Behalf Of' section is highlighted with a red box. The main area displays a table of accounts. The top section is labeled 'Profile' and has a red box around the header. It contains one account with Name/User ID 'cmsaa start', Contact Information '...', Identifiers '...', Last Login '-', and Last Updated '08/20/2025 02:53 PM'. The bottom section is labeled 'Prime' and has a red box around the header. It contains one account with Name/User ID 'cmsaa start', Contact Information '...', Entitlements '37', Identifiers '-', Last Login '08/21/2025 06:04 AM', and Last Updated '08/01/2025 02:04 PM'. At the bottom, there are status filters: Active, Disabled By Admin, Disabled By FINRA, Password Lockout, Security Question Lockout, Deleted, and Draft.

### 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 [+ Show More](#) is presented to assist you in searching for your OBO accounts:  
**On Behalf Of**

- Prime

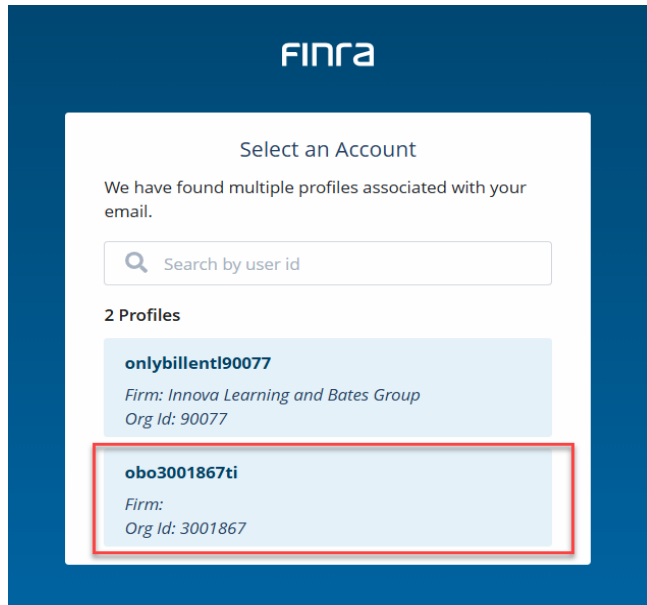
The screenshot shows the 'Vendor\*View' interface. On the left, there is a navigation panel with several filter sections: 'No (1)', 'Account Access' (CAT Prod (1), MFA Enabled (1)), and 'On Behalf Of' (Prime (1)). The 'On Behalf Of' section is highlighted with a red box. The main area displays a table of accounts. The top section is labeled 'Prime' and has a red box around the header. It contains one account with Name/User ID 'CertOtherMtlcr3', Contact Information '353656456363', Entitlements '12', Identifiers '-', Last Login '08/21/2025 06:15 AM', and Last Updated '08/20/2025 02:53 PM'. At the bottom, there are status filters: AA, MFA Enabled, CAT Prod, CREP, Password Lockout, Security Question Lockout, Deleted, and Draft.

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.

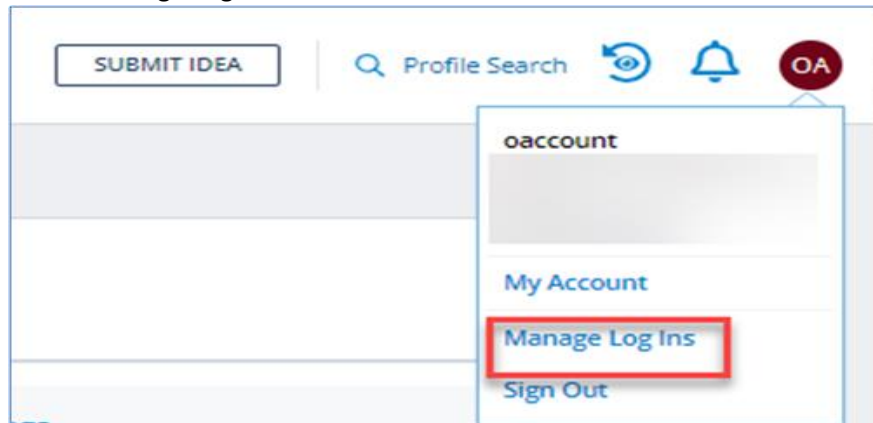
## Section 6: How to Switch Between Accounts?

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](#).

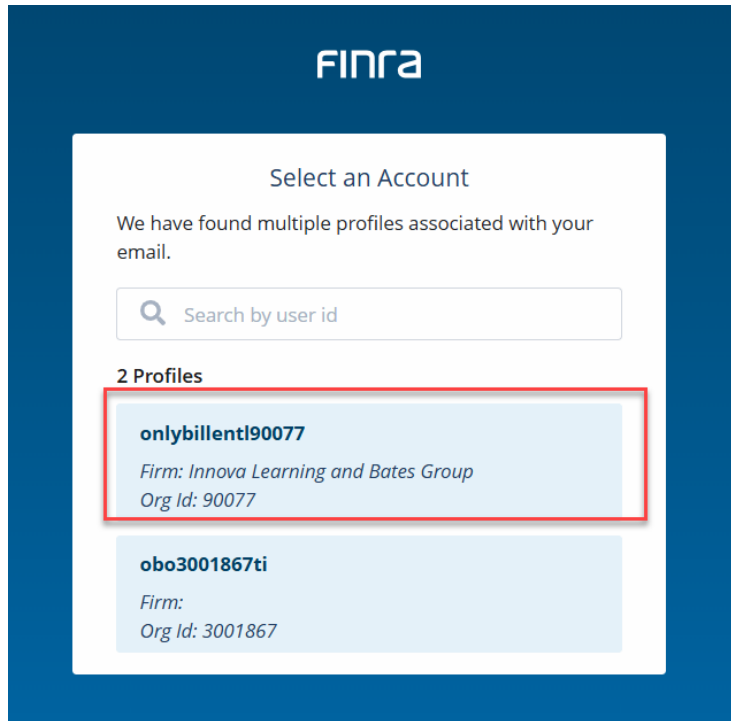


2. To switch back to your vendor\* account, click on your User Profile again in the upper right-hand corner and select Manage Log Ins.



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

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.