



## 2. Overview of remediation (to be completed by Finding Owner)

### Summary of remediation

#### • Existing accounts:

- i. Determined EEA Customers/accounts (excluding UK and Germany).
- ii. Determined EEA accounts to be retained or exited (retain financials criteria: CBV>Eur2m or Annualized Rev>Eur20k).
- iii. Obtained reverse solicitation evidence (banker's attestation or EEA Client Declaration form) and reviewed with US compliance & DCO.
- iv. Exited/restricted EEA accounts not meeting financials criteria with the exception of 2 DPM accounts holding illiquid positions and for which management fees were removed.
- v. Obtained Mgmt exception approval to retain EEA accounts not meeting the financials criteria due to strong business rational to be retained.

#### • New accounts:

- i. Implemented approval process for new EEA clients/accounts (EMEA legal & compliance approvals – see attached evidence for operational effectiveness).
- ii. Implemented reverse solicitation controls at the lead/prospect, account, and transaction levels.
- iii. Implemented and communicated process to identify EEA clients to ABR/AFC (see attached evidence for operational effectiveness).

- Implemented controls (checklist) for doimicle changes into the EEA and updated coverage and TAG Teams KOPs.
- Rolled out training to impacted staff.
- Drafted proposed controls for EEA designated bankers team to be implemented for EEA clients.

### Rationale for holistic vs localised approach (complete for F3-F4 severity findings)

Localised approach was taken to address reverse solicitation requirements in order to not require MIFID II implementation for EEA clients (excluding UK and Germany) serviced by WM US.

### Remediation Details

*Include a summary of key themes identified as part of the Finding and the associated remediation approach*

Finding Area/Risk statement(s)	New/amended compensating control(s) & additional remedial activities
Confirm existing account scope	Accounts have been identified through data query and validated by Business Mgrs, who reviewed with Accountable Client Owners (ACOs) to confirm whether in scope for EEA (Ind/Joint: acct holder(s) or decision maker, Legal Entities: country of primary decision maker(s)).
Determine EEA accounts to be retained or exited	Accounts meeting the "retain financials" criteria established by mgmt. were retained. Otherwise exited unless an exception to retain was approved by WM Americas COO. (retain financials criteria: CBV>Eur2m or Annualized Rev>Eur20k).
EEA retain accounts /remediation (see attachment for further details)	Obtained reverse solicitation evidence (banker's attestation or EEA Client Declaration form) and reviewed with US compliance & DCO.
EEA exit accounts/remediation (see attachment for further details)	Mailed exit letters to clients (2 letters) for accounts in scope. Once transfer instructions were obtained from the client proceeded with closure or account restrictions (where possible). 2 DPM accounts remained open as they hold illiquid positions and for which management fees were removed.
EEA exit accounts – exceptions to retain	Obtained Mgmt approval and obtained reverse solicitation evidence for EEA accounts not meeting the financials criteria but with strong business rational to be retained (e.g. future growth opportunities).
Training	Training was conducted in September 2018 to impacted staff.
Process to determine EEA customers	Required steps have been outlined and communicated to

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