



	assigned owners (AFC & ABR). Owners have performed training / communication to staff, steps are being followed by respective teams.
Controls	Implemented approval process for the new EEA clients/accounts. Implemented reverse solicitation controls at the lead/prospect, account, and transaction levels. Implemented controls (checklist) for domicile changes into the EEA.
EEA Designated Bankers Team	Drafted proposal for EEA designated bankers team to be implemented by Sub-GMT heads.
KOP Updates	All impacted groups, including control groups, have updated procedures.

Details on new or amended controls:

1. **Process to determine EEA customers** - Detail process to assess EEA client applicability for new clients and changes for existing clients and update EEA type/EEA country fields in dbForce at the Customer level. Required steps have been outlined and communicated to assigned owners (AFC & ABR). Owners have performed training / communication to staff, KOPs have been updated and steps are being followed by respective teams.
 - **Lead owner:** ABR & AFC
 - **Status:** Complete
 - **Attachment:** KYC KOPs
2. **Reverse Solicitation Controls for new EEA customers/accounts/Transactions: (add description)**
 - **Lead owners:**
 - a. Non-target approval – owner: Business Manager
 - b. Account opening – owners: DBOI/ABR Tax (Trust, Custody, DPM & Deposits), ABR (Lending), and Middle Office (Brokerage).
 - c. Transaction – owner: BSO
 - d. Domicile changes into the EEA – owner: Business Manager & DBOI
 - **Status:** Complete
 - **Attachment:** EEA controls summary
3. **EEA Designated Bankers Team** – Identified proposed controls for EEA designated bankers team to be implemented for EEA clients.
 - **Lead Owner:** Project Team
 - **Status:** Complete (separate implementation SII #####)
 - **Attachment:** EEA controls summary
4. **KOP Updates** - Update KOPs to reflect new/enhanced requirements specific to existing and new EEA clients for Coverage, ISG/IWP, and control groups.
 - **Lead owners:** Coverage, ABR/AFC, Middle Office, BSO, DBOI and TAG Teams
 - **Status:** Complete
 - **Attachment:** Coverage KOPs, KYC KOPs, MO EEA KOPs, DBOI (AOG) EEA KOPs, BSO EEA KOPs and TAG Team (DBOI/Baltiore) KOPs.

Comment [SE1]: 1. Add new important SII ref #

Details on new systems/material system changes (optional - depending on remediation)

N/A

Details on new models/material models changes (optional - depending on remediation)

N/A

Deviations to original action plans and subsequent communications with external parties

No deviations from original action plan.