EEA Client Identification

The European Economic Area is not a target market for WM Americas, thus EEA accounts are limited (case by case) and should follow the proper approval process and controls. These limited EEA accounts must always be the result of Reverse Solicitation (client exclusively initiates the business rather than the other way around) as client facing staff is prohibited from actively soliciting or offering any products or services to EEA clients. Since there are restrictions on activity for all EEA countries, EEA client identification is important to ensure compliance with regulatory requirements and implemented controls.

Criteria to identify EEA client or EEA account:
- **Individual/Joint accounts:**
  - Account holder(s) resides in the EEA
  - Primary decision maker(s) resides in the EEA

- **Legal Entity accounts:**
  - Primary decision maker(s) resides in the EEA
  - Account holder(s) resides in Germany

Note: EEA client identification is based on country of domicile, not citizenship or incorporation.

Identification of Primary Decision Maker:
The below steps outline how Primary Decision Maker may be selected in each KYC completed by the FO or CM. Please see detailed steps below:

1. For every KYC, the FO/CM should indicate if any KYC Party Role is a Primary Decision Maker by noting **"Primary Decision Maker"** on the "Please Describe" party role field.
   - This designation is not required for individual/joint natural person accounts, unless a separate POA is authorized.

2. ABR/AFC (based on risk rating) will identify the country of residence for the Primary Decision Maker as indicated by the FO/CM and mark the EEA flag if applicable.

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