

1. Upon completion of the non-target lead form in DB Force, the relationship manager's team must indicate whether this client was or was not solicited. If the client is not solicited, supporting details must be given.

Additional Contact Information	
Address Type: <input type="text" value="--None--"/>	Primary Phone Type: <input type="text" value="--None--"/>
Organization Name: <input type="text"/>	Phone: <input type="text"/>
Business Title/Suffix: <input type="text"/>	Business Phone: <input type="text"/>
Country: <input type="text" value="United Kingdom"/>	Mobile: <input type="text"/>
Street: <input type="text"/>	Fax: <input type="text"/>
City: <input type="text"/>	Toll-free: <input type="text"/>
State/Province: <input type="text" value="--None--"/>	Case#2: <input type="text"/>
Zip/Postal Code: <input type="text"/>	Website: <input type="text"/>
Was client solicited?: <input type="text" value="--None--"/>	Not Solicited - Supporting Detail: <input type="text"/>

2. Upon submission, the lead record will route to Business Manager for approval. The Business Manager must obtain and attach a number of approvals prior to approving in DB Force:
 - o Regional Business Head or their delegate
 - o EMEA legal AND compliance (US Compliance will be responsible for obtaining these approvals)
3. If the non-target request is rejected, the Regional Business Head may challenge the decision by escalating to Patrick Campion.
4. Once Business Manager approves, the lead is routed to BSO, who must ensure that all required approvals are attached to the non-target lead request prior to their approval.

EEA Client Declaration Form

<http://americas.awm.intranet.db.com/en/html/56462.php>

1. All EEA Clients (excluding Germany) must sign the EEA Client Declaration form as evidence of non-solicitation. Once the client provides the signed form, their banker must also sign.
2. If the client is a pre-existing client, and the new EEA Lead/Prospect approvals were not gathered for this particular account opening in the previous step, they must now be completed. Business Manager should only sign once ALL approvals have been obtained.
3. Once completed, the EEA client declaration form must be attached within the account opening process and routed, with the other account opening documents, to the Account Opening Review Group for review.
4. The Account Opening Review Group must ensure that the form is signed by the client, the Relationship Manager, and the Business Manager. If the form is incomplete, the account opening request must be rejected, and the case sent back to the Relationship Manager for completion.

IMPORTANT NOTE REGARDING EEA-UK Brokerage Accounts:

In order for ISG to service brokerage accounts for a UK client, one of the following must apply:

1. Entity Account Holder meets the UK High Net Worth Company (HNWC) Exemption criteria as reflected on the High Net Worth Company Assessment & Declaration form ("HNWC Exemption form"); or
2. Exception approval was granted and is attached with account opening documents (for Entities which do not meet HNWC Exemption criteria, or for Individual accounts).

NOTE: For Entity clients meeting HNWC Exemption, Financial Promotions must come from ISG Investment Specialists only and a Financial Promotion Disclosure Letter must be attached.

How to process UK HNWC Exemption Forms

Once all required internal signatures are obtained, the form must be imaged to the client's record. As the client's UK HNWC Exemption status must be re-assessed annually, a new form will be required each year. Storing the form in dbForce will enable future identification of forms which are expiring and require update.

Please follow these steps to add the form to dbForce:

- i. If a new account, HNWC Exemption form must be attached with all account opening docs