

- ii. Go to dbForce **Account** record
- iii. Go to **Open Activities** subsection
- iv. Select **New Task**. Continue for "Task" record type.
- v. Enter the following information in the Task fields:
 - **Subject:** UK HNW Company Exemption
 - **Due Date:** Date of last signature on form (BSO's signature)
 - **Type:** Other
 - **Status:** In Progress
 - **Assign to:** Diana Canter
 - Select **Attach File** and upload signed form
 - Click **Save**

IMPORTANT NOTE REGARDING EEA (ex German) Clients: A Relationship Manager may cover an EEA customer under the following circumstances:

1. A Non Target approval, including supplemental approvals from Legal and Compliance in both the US and Europe, must be obtained.
2. All EEA Clients (excluding Germany) must be serviced on a fully REVERSE SOLICITATION basis. You may not make ANY recommendations to this customer.
3. All EEA Clients (excluding Germany) must sign the EEA Client Declaration form as evidence of non-solicitation. Once the client provides the signed form, the Relationship Manager and the Business Manager must also sign.
4. For each new account opening request, large transactions, and marketing materials, reverse solicitation must be evidenced in a Cross Border Call Note, which gives a detailed explanation of how and when the customer asked you to provide said documents.

Account Opening Review Group by Product Type

<u>Account Opening Review Group</u>	<u>Product Type</u>
DBOI	Deposits, Custody, DPM and Trust
Middle Office	Brokerage
KYC/ABR	Residential and Structured Lending

Transaction Level Reverse Solicitation Requirements

<u>Account Type</u>	<u>Transaction Activity</u>	<u>Additional Funds to an existing Acct</u>
DPM	No	Yes
Custody	No	No
Brokerage	No	No
Deposit	No	Yes
Lending	No	No

A Cross Border Call Note is mandatory when discussing DBTCA's products and services with a non-US client. If the client is an EEA client with a DPM and/or Deposit account, and the communication is in reference to "Additional Funds" to an existing account(s) due to a client's liquidity event such as, sale of a real estate asset, inheritance, etc., the RM must also include a detailed explanation of reverse solicitation and/or attach proof on the Cross Border Call Note. Details of how "Additional Funds" were introduced during conversation and how the funds ended up allocated to the DPM or Deposit account must be included.