

Due to the suspension of the code delivery for interdivisional KYC attestation process, WM clients will be on boarded onto GM platforms directly. The business is required to outline the issues and remediate the risks attached. Absent of remediation puts the business at risk for not meeting some of the Compliance and AFC requirements. The remediation plan needs to be created and attached.

Remediation should include but not limited to –

- 1- Identifying client population that has derivative transactions need to be classified as per MIFID II.
- 2- creating an opt up professional process for the WM clients as GM does not service Retail clients.
- 3- creating a process for identification of the deltas in KYC.
- 4- creating KOPs for the overall process.
- 5- Identifying the Brexit requirements.

Thanks,

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-----Original Appointment-----

**From:** Victoria Bruce

**Sent:** Wednesday, February 13, 2019 3:16 PM

**To:** Victoria Bruce; Funda Bozkurt; Thomas Klemm; Kimberly Hart; Puzant Merdinian; Steven Mattus; Olivier Poncet; Ian Salters; Andrea DeMar; Bill King; Jeffrey Roth

**Subject:** FW: Client OTC derivatives trading with CIB [I]

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