

UK AFC are kindly in receipt of the KCP GM policy dated June 2017 (duly noted that this is currently under review), this document has proved useful in giving context to the UK GM product nexus with solely a US booking.

Due to the local UK time, I will be discussing KCP Extensions with my management on Monday as to best understand and process such requests in the future.
I truly appreciate the time and knowledge that has been shared and look forward to our conversations next week as to support each other.

Many thanks all,

<image001.gif>

James Gladwin
AFC Business Advisory
Anti-Financial Crime

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[REDACTED]

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From: James Gladwin
Sent: 10 May 2018 09:47
To: Martin Zeman [REDACTED]; Zack Bunimovich [REDACTED]; Jesse-J Cruz <[REDACTED]>
Cc: Karen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]; Nina Tona [REDACTED]; Xavier Avila [REDACTED]; Davide-A Sferrazza <[REDACTED]> AMLUK Reviews <[REDACTED]> Devshiji Odedra <[REDACTED]>
Subject: RE: Escalation: ONB-1135648 / LKYCGB-160049 / Southern Financial LLC [!]

Classification: **For internal use only**

Hello all,

Do we have BRG approval for this?
This appears to be a cross-jurisdictional adoption from DBSI to DB AG, furthermore, the LRD for the US is 2016 and does not appear to be in the Remediation pipeline?

For Extensions to be approved, AFC UK require:

- i. BRG approval to consider cross-jurisdictional approvals which result in newly booked High Risk clients
- ii. The file to be within NRD date and if not, must be within the Remediation pipeline – of which it appears it is neither

@CDS colleagues,

Please consider the above points, I am happy to further explain on the phone to assist our business colleagues & clients expectations.

@Martin

I will keep you updated on the progress made.

Many thanks all,