

- a. KCP clients had migrated from dbCLIENT to dbCAR, potentially the migration did not complete correctly (this will continue to be investigated SEPERATELY to this Extension request)
- b. At the very first adoption of the client/extension to UK GM products, this was not correctly booked within our internal systems
- iv. Fixes to the dbCAR profile were discussed between Global CDS teams, of which the latter was chosen due to time constraints and the impact upon our first line colleagues ;
 - a. LKYC-US to be reviewed and approved by US colleagues which would subsequently updated the LRD/NRD dates, subsequent leverage could be used off of the LRDs to create an NCA to book the client correctly (US CDS colleagues advised that they did not believe the LKYCUS was to be further actioned)
 - b. LKYC-GB to be approved to kick start the NCA & LRD/NRD dates within dbCAR
- v. Following the LKYC-GB being approved, the file was immediately reviewed and was deemed that the UK adoption location had been fixed
- vi. Subsequent Extension request was approved

Many thanks to all that shared their knowledge, I will be looking further into KCP clients with UK adoptions to ensure that such scenarios do not become a recurrent theme.
As always, please give me a shout if you have any questions.

Kind regards,



James Gladwin
AFC Business Advisory
Anti-Financial Crime

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From: James Gladwin

Sent: 11 May 2018 18:44

To: Martin Zeman [REDACTED]; Zack Bunimovich [REDACTED]; Jesse-J Cruz [REDACTED]

Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]; Nina Tona [REDACTED];
Xavier Avila [REDACTED]; Davide-A Sferrazza [REDACTED]; AMLUK [REDACTED]

Reviews [REDACTED]; Devshiji Odedra [REDACTED]; Ian Salters [REDACTED];

Simon Nall [REDACTED]; Ricky-x Patel [REDACTED]

Subject: RE: Escalation: ONB-1135648 / LKYCGB-160049 / Southern Financial LLC [I]

Classification: **For internal use only**

Hello all,

I have had the pleasure with speaking directly with Martin and colleagues to assist UK AFC with this KCP Extension. 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.