

2016 AFC AML Advisory
Enhanced Due Diligence (“EDD”) and Event Driven Review (“EDR”)
Key Operating Procedures

1. Obtain and review collected documentation and information from either Global Markets or Corporate Finance Client On-Boarding (“GM/CF COB”)
 - For EDDs, ensure all appropriate documentation and information has been provided, depending on the type of entity it is (see Customer Due Diligence Requirements Matrix for description of each legal entity):
 - Government certified document
 - Five control persons, as appropriate
 - Results from PCR/RDC checks on entity, control persons, UBOs
 - UBO verification/CIS Questionnaire/Private Equity Fund Questionnaire
 - UBO passports, as appropriate
 - If publicly traded on a DB-approved exchange, evidence of such and percentage of listing
 - If regulated by a DB-approved regulator, evidence of regulation
 - Foreign Bank Certificate and AML Questionnaire for non-US banks
 - For GM relationships, answers to “five questions” on source of wealth/funds, type of account, expected activity
 - For CF/CRE relationships, NCA form/Business Sponsorship Form detailing expected activity and source of wealth
 - Risk Rating Form
 - Other approvals as needed (from US Sanctions or Group Sustainability or Anti-Bribery & Corruption, etc.)
 - For EDRs, ensure escalation is on newly identified high risk criteria (e.g., new PEP found, new UBO of high risk nationality, etc.). If in doubt, request further information from COB (and from the business if necessary) or review previous Investigation Logs. EDRs are usually performed due to a newly identified high risk trigger, so documentation is required at the discretion of AML Compliance.
 - For GM, ensure systems (dbCAR) maintain correct information on the potential customer, control persons, UBOs
 - For CF/CRE, ensure NCA Forms / Issues Checklists include correct information on the potential customer, control persons, UBOs
2. Save potential customer documents and escalation e-mails to shared drive. Create a folder in the name of the potential customer on the shared drive (location - P:\Central_Functions_Compliance\Comp-nyseccom\Varela\AML\2016 PENDING EDD & EDR & NLS)
3. Conduct searches within LEXIS and Google -
 - A) Search LEXIS for entity, control persons, UBOs
 - Website: www.lexis.com

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