

# Appendix D – Global Banking Assessment

## 1.1 Quarterly Global Banking AML/NCA File Assessment - Overview

The DBUS AML Compliance Unit ("AML Unit") will conduct *Quarterly AML/NCA File Review Assessments* ("File Review") on ten (10) randomly selected new client adoption files affected by Global Banking (ex. GTB) to evaluate the adequacy of the AML aspects of the new client adoption process. This File Assessment is designed to assess the AML controls of new client adoption processes instituted by Global Banking as well as escalation processes for high risk accounts as defined by DBUS AML Policy.

The File Review will focus on the functional aspects of the required new client adoption processes surrounding AML compliance including, Customer Identification Program elements (Notification, Identification, Verification, Retention) as well as verification documentation, as appropriate. The File Review will also include a qualitative review of PCR and RDC alerts (if any) and the decisioning around escalation processes as defined within DBUS policy.

As part of the File Review, the AML Unit will take into consideration DBUS AML policy, Global Banking New Client Adoption Process procedures, applicable USA PATRIOT Act provisions (Section 326) as well as regulations and guidance administered by applicable Self Regulatory Organizations (i.e. NYSE, NASD.)

## 2.1 File Review Procedures –

### **Step 1 – Communication to Global Banking Management**

The AML Unit will notify CAM, Business Information Services (BIS), the GB CAO and GB Compliance Advisory (via e-mail or other communications) that a File Review will be executed on AML aspects of new client adoption for the previous quarter.

### **Step 2 - Obtain a list of new client adoptions for previous Quarter**

The AML Unit will send a request to Global Banking Compliance Advisory for a list of all new client adoptions affected by Global Banking in the previous quarter for Global Banking. (e.g. 3<sup>rd</sup> quarter File Review includes new client adoptions executed in the 2<sup>nd</sup> quarter.)

### **Step 3 - Random selection of files**

Upon receipt of the new client adoption list, the AML Unit will randomly select ten (10) new client adoptions from the Global Banking business for assessment purposes; the AML Unit will sample every 10<sup>th</sup> new client adoption captured on the list provided by Global Banking Compliance Advisory.

### **Step 4 - Review of Global Banking Files**

CAM and BIS will make the selected files available to the AML Unit. A member of the AML Unit will review each file taking into account the below related File Review elements. The original new client adoption files will not leave the Global Banking area; rather, the AML Unit may make copies of documentation to support the File Review, as appropriate.

### **Step 5 - File Review elements**

The AML Unit will review each file and assess appropriate steps were taken as part of the AML aspects of new client adoption within Global Banking. Items that will be reviewed are:

- 1) Deal team memo detailing nature of customer relationship
- 2) Files to be checked for functional aspects of Customer Identification Program requirements
  - CIP Notification
  - Identification information
  - Verification (non-documentary/documentary)
  - Retention of documentation/information

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