
From: Stewart Oldfield [REDACTED]
Sent: 11/21/2018 10:09:07 AM
To: Bradley Gillin [REDACTED]
Subject: FW: MR / LR remediation - your portfolio
Attachments: 2018_11_13_ACO_Stewart Oldfield.pdf; 2018_11_13_ACO_Stewart Oldfield_Remediation_Portfolio.xlsx

fyi

From: Corinna-A Reibchen
Sent: Tuesday, November 20, 2018 7:25 PM
To: Stewart Oldfield <[REDACTED]>
Subject: MR / LR remediation - your portfolio

Dear Stewart,

My name is Corinna Reibchen. I am the CEO of passcon LLC, a consulting firm specialized in KYC for the banking sector. Passcon has been hired by Deutsche Bank Wealth Management U.S. to support the high risk remediation in 2018 as well as low and medium risk remediation in 2019.

As per Thomas Klemm's email from Friday November 16th, we have compiled all relevant data points from the static data systems (like dbForce and GMIS) to provide you with an overview of your individual client portfolio in scope for the 2019 low and medium risk remediation.

Please find attached your individual client portfolio which will be part of this remediation.

What are we doing for you?

Our primary goal is to perform the low and medium risk remediation as seamlessly as possible for you and your clients. For this reason, we are currently discussing integrating client outreach into the KYC process, which will be conducted by passcon's well-trained KYC Analysts. We see this as an exciting new development in the KYC process, as it will allow you to focus on developing your client relationships, while we take ownership over retrieving documents to complete the cases.

We can assure you that the client outreach will be client-oriented and highly professional, giving you peace of mind that your clients will be in good hands.

I would like to give you the following details of the process:

1. Detailed overview of your individual client portfolio

We will compile your individual client portfolio based on the existing information in the static data systems (as noted above). We will contact you to discuss the portfolio especially with regards to potential exits or where you would like to reach out to the clients due to an expected complexity or sensitivity. That way, all stakeholders are on the same page.

2. Client Outreach

Before we reach out to any of your clients we will discuss with you the best way to contact the clients. Please specify those clients that you would like to reach out to directly (max. 20 %), in the file attached, Column P.

You will always be copied in and all ACO-confirmed clients will be contacted during the KYC process by passcon in case of missing documents or information. The initial timeframe to deliver the requested information will be 4 weeks. After reaching the 4 week milestone without getting the necessary information, two reminders will be sent out every two weeks. In case of unresponsive clients an agreed escalation process from passcon to you will be followed to consider the exit option in the worst case.

Please note that before we reach out to the clients we will discuss the missing information first of all with you and will then only reach out to the client with the agreed remaining outstanding required information. To provide comfort to you on our experience and the feasibility of our approach, we will agree on certain clients with you to conduct a pilot on this outreach.