

Subject: Managed Exit account handling
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Term	Definition
PA Checks/Review	Review of client account activity to establish open obligations which prevent offboard
Managed Exit	A process state for client entities identified for offboarding but have open obligations which prevent process completion
Notification	The process of sending a client notification to terminate the contractual relationship at the end of a defined notice period
In Closure	The process of closing DB transactional system accounts representing the impacted client entity
Offboarded	A count of client entities which have completed all offboarding process stages, and are inactivated through to KYC Records - classified as 'Full' Offboard when evidenced, complete removal of client entity from all businesses & jurisdictions inclusive of all tech platforms. Applied to all DB adoption entities globally.

Below is how the CIB process works:

- * The client is marked to be Off-Boarded but cannot be as there is an outstanding obligation (i.e. loan or position) with the client
- * Client has been deemed to be KYC relevant by Business
- * Managed Exit team searches in paid/public sources for the 4 below attributes
 - * Proof of Existence
 - * Legal Representatives
 - * Ownership/IBO
 - * Identity (ID)/Nationality & Source of Wealth (SOW) (Net Worth & source from where it is acquired)
- * If not found, 2 notification letters are dispatched to the client seeking information
- * Business is not involved in the sourcing of data

- * Case is enriched
- * KYC is collected on a best effort basis and if all 4 attributes cannot be sourced it is notated in the file
- * Account will be quarantined until the obligation/position expires
- * ACO signs off on the Managed Exit
- * If High Risk, case is escalated to AFC for approval
- * After obligation/position expires, client will be Off-Boarded

The process will continue as per the Risk Rating (1 year -- High, 2 years – Medium, 5 – Low) until the position expires. Please let me know if you have any questions.