

EEA (ex-Germany) Cross-Border Implementation
WM Americas – Front Office Training
September 2018

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Background

As communicated by Patrick Campion in late May 2018, as a result of European regulatory changes (e.g. MiFID II, PRIIPs) and to mitigate cross-border risk and market complexity, Wealth Management Americas has conducted an in-depth assessment in order to determine EEA (European Economic Area) countries where client services will be retained or discontinued.

Key Considerations for EEA clients/accounts:

The EEA is not a target market for WM Americas.

On-boarding new EEA clients or opening new EEA accounts will be limited (on a case by case basis) and should follow the proper approval process and controls.

Reverse solicitation (on client's own initiative) although permitted (on a case by case basis) cannot be relied upon as a business model and must be evidenced.

Client Facing Staff is prohibited from actively soliciting/offering any products and services.

Only a limited number of clients/accounts and the professionals that cover those accounts. (reduce EEA footprint).

All WM Americas Client Facing Staff must continue to familiarize themselves with the Cross Border Policy and country specific cross border guidelines to ensure appropriate conduct of business when interacting with clients and prospective clients in the EEA.

2

Mention that reverse solicitation is a mandate under cross border rules effective a few years ago. It connects to MiFID II as prove of reverse solicitation is required to not trigger MiFID II requirements.

WM Americas is not triggering branch/licensing requirements as long as EEA clients are exclusively served on a reverse solicitation.

The current BaFIN exemption permits DBTCA to serve a large number of German clients (Explanation as to why Germany is excluded).

Under MiFID II (section 109) – Third Country Firms (DBWM US) who plan to actively market investment services in the EEA are subject to the specific countries local rules and requirements as well.

Breach or violation of reverse solicitation requirements could potentially negatively impact DB legal entities in the EEA.

WM Americas is in progress of reducing the number of EEA clients/accounts to minimize footprint in the EEA and regulatory exposure.

FO should continue to stay up to date regarding any updates to the cross border guidelines. Alert emails indicating that cross border guidelines are being distributed, please familiarize yourself with the changes.

2

MiFID II and Third Country Firms:

In order for third country firms (e.g. DBSI, DBTCA, DBNTC and DBTCNA) to actively target and/or solicit investment services into the EEA, they must comply with local country rules (e.g. establishment of a license/branch) and MiFID II requirements (effective January 3, 2018).

Do's

DBSI, DBTCA, DBNTC and DBTCNA are permitted to provide investment services (on a case by case basis) at the exclusive initiative of the client ("reverse solicitation").

Don'ts

DBSI, DBTCA, DBNTC and DBTCNA employees are prohibited from soliciting clients or potential clients or promoting or advertising investment services in the EEA without the establishment of a branch/license.

Third Country Firms Requirements to interact with EEA Clients

3

WM Americas Sr Mgmt decided not to establish branch/licensing in any EEA country.

3

Reverse Solicitation

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What is reverse solicitation?

Reverse solicitation occurs when the client and not the bank takes the exclusive initiative to start the relationship or inquire about a specific product and/or service. The product and/or service provided to the client cannot be extended to include products and/or services beyond the subject matter of the client's reverse solicitation.

Key Considerations:

Reverse solicitation cannot be a business model to service EEA clients/-accounts.

Reverse solicitation for EEA clients/accounts must be evidenced at the Lead/-Prospect, account and transaction level (if applicable).

Referrals alone are not considered documentary evidence for reverse solicitation as contact/prospect should initiate contact.

MiFID II was implemented for Germany but will not be implemented for any other EEA country. To continue servicing EEA clients, WM Americas must rely on reverse solicitation.

4

Scenario #1: RM is performing the annual review for an existing DPM EEA client. During the RM/client conversation, the client mentioned the sale of his/her vacation home. The sale of the home was \$1MM. After hearing of this latest sale, the RM proceeds to describe current DB products offerings (e.g. brokerage related products) and opportunities to invest within DB. In this scenario, RM violates reverse solicitation requirements.

Scenario #2: RM based in DB London calls a New York based DB RM to discuss an opportunity where a DB London based client (client domiciled in the UK) is interested in pursuing business opportunities in NY as well to establish a DPM and brokerage account. London RM mentions to the NY RM that the UK client is on vacation and that the client will contact the NY RM in 5 business days. After 10 business days go by, the NY RM decides that he should take matters in his own hands and contact the client. NY RM was able to reach the client and during this call proceeds to outline and describe the key offerings that the NY office can provide. In this scenario, RM violates reverse solicitation requirements.

Reverse Solicitation – Scenarios

5

Scenario #1:

RM is only able to obtain instructions from the client. The client should list potential products/services for him to invest the proceeds of the vacation home sale. RM should disclose products/services available to EEA clients (e.g. brokerage accts will be managed by the Client Service Center – Client directed acct).

Scenario # 2:

What could have the NY RM done? NY RM to notify UK based RM that client has not contacted NY. UK based RM may follow up with the client directly.

5

Key Changes Impacting WM Americas EEA Business:

EEA exit accounts: exit letters were sent to clients requesting transfer/-closing instructions (LOIs) for impacted accounts.

EEA retain accounts:

Documentary evidence of "reverse solicitation" (i.e. evidence that the client approached Wealth Management with a request to obtain the services) must be obtained.

EEA retain brokerage accounts:

Will be transferred to the Jacksonville client service center to meet reverse solicitation requirements at the transaction level.

Brokerage accounts for entities where primary decision maker is in UK may remain with ISG provided that HNW Company Assessment & Declaration form is completed and approved.

New EEA clients/accounts: must follow EEA approval process and service exclusively on a reverse solicitation basis to avoid triggering MiFID II and/or local country requirements (branch/licensing).

6

EEA Criteria & EEA Country List

Any client/account meeting the below criteria will be denoted as EEA client or EEA account:

EEA Country List:

Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom, Iceland, Liechtenstein and Norway.

Please note that EEA clients/accounts must be serviced exclusively on a reverse solicitation basis by WM Americas as per the existing cross border rules.

7

Account Type

EEA Criteria

EEA Notation

Individual/Joint

Account holder(s) or Primary Decision Maker domiciled in the EEA

Yes

Legal Entity

Primary Decision Maker(s) domiciled in the EEA

Yes

Talking points:

1. For legal entities country of establishment and citizenship are irrelevant to determine EEA clients/accounts.

7

Reverse Solicitation Controls (Excl Germany)

8

Control Name

Control Details

1. New EEA Leads / Prospects

RM Team completes Non-target Lead form in dbForce(1).

RM reviews and submits Non-target Lead form for BM approval after obtaining written approval from Regional Business Head.

BM to obtain and attach EMEA Legal and Compliance(2) approval prior to approving non-target lead request.

BSO to ensure required approval emails are attached to the Non-Target lead request and proceed with approval or rejection.

(1) "Was client solicited" and "Not Solicited – Supporting Details" are required dbForce fields for EEA clients/accounts.

(2)The below information must be provided as part of EMEA Legal and Compliance approval request:

Domicile of client / entity / Business Owner / decision takers for the account

Services and products to be offered: discretionary, advisory, funds, structured products, derivatives etc.

Custody, if in different location

Can the client be serviced in the EEA? If not, why?

What are the client's intention with the product and/or service?

Identification - Primary Decision Maker (Interim solution) For every KYC completed, the FO must indicate the Primary Decision Maker by noting "Primary Decision Maker" on the "Please Describe" field as per below. This designation is not required for individual/joint natural person accounts without a POA. Primary Decision Maker is defined as one or more individuals responsible for making investment decisions on behalf of the account. Please note; If a client facing professional has any communications with a different decision maker who resides in the EEA regarding new products and services, please reach out to ABR or AFC to amend the KYC and make any required edits to dbForce.

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image001

Talking points:

1. For legal entities country of establishment and citizenship are irrelevant to determine EEA clients/accounts.

9

Reverse Solicitation Controls (Excl Germany)

10

Control Name

Control Details

2. New Accounts

BM to obtain/coordinate approvals from Regional Business Head and EMEA Legal and Compliance(1). Sign and return the EEA Client Declaration form and email approvals to RM Team. (Please see Appendix A – EEA Client Declaration Form).

RM Team to submit EEA Client Declaration form and approval emails in conjunction with account opening documents to Account Opening Review Group for review and approval.

Account Opening Review Group(2) will reject new account requests if EEA Client Declaration form is not complete, the request must be rejected.

(1)The below information must be provided as part of EMEA Legal and Compliance approval request:

Domicile of client / entity / Business Owner / decision takers for the account

Services and products to be offered: discretionary, advisory, funds, structured products, derivatives etc.

Custody, if in different location

Can the client be serviced in the EEA? If not, why?

What are the client's intention with the product and/or service?

(2) Account Opening Review Groups by Account Type:

Reverse Solicitation Controls (Excl Germany)

11

3. Transaction Level – Additional Funds to an existing account table:

A Cross Border Call Note is mandatory when discussing DBTCA's products and services with a non-US client. If the client is an EEA client with a DPM and/or Deposit account, and the communication is in reference to "Additional Funds" to an existing account(s) due to a client's liquidity event such as, sale of a real estate asset, inheritance, etc., the RM must also include a detailed explanation of reverse solicitation and/or attach proof on the Cross Border Call Note.

2. RM Team should provide the following details under the "Cross Border Call Note" comments section:

Details of how "Additional Funds" were introduced during conversation

Details of how "Additional Funds" ended up allocated to a DPM or Deposit account

BM Team to review monthly (first 6 months and thereafter quarterly) dbForce "EEA Reverse Solicitation Opportunity" report and identify a sample to ensure reverse solicitation evidence meets the requirements. If not available, reach out to RM Team and request reverse solicitation evidence.

Tag teams (DBOI and Baltimore) to ensure proper substantiation is available in TEAS Step CD held in a Brokerage account report.

BSO to review monthly (first 6 months and after quarterly) "Inflow" report and spot check transaction above 1mm and ensure a "Cross Border Call Note" is available with details of reverse solicitation evidence. If not available, BSO to escalate to BM Team for further research.

Brokerage accounts for qualified entities where primary decision maker(s) is located in the United Kingdom, may receive Financial Promotions from an Investment Specialist.

A Financial Promotion is 'an invitation or inducement to engage in investment activity.'

Financial Promotions are only permissible for entity brokerage accounts where the client qualifies as a High Net Worth Company:

A corporate entity which has, or which is a member of the same group as an undertaking which has, a called-up share capital or net assets of at least GBP 500,000 (in the case of a corporate entity with more than 20 members or which is a subsidiary of a parent undertaking with more than 20 members) or at least GBP 5 million (in any other case).

An unincorporated association or partnership which has net assets of at least GBP 5 million

A trust with assets (before deducting any liabilities) of at least GBP 10 million

NOTE: The person receiving financial promotions on behalf of any of the entities described in (a) to (c) above must be acting in his capacity as a director, officer, trustee or employee and must be authorized to make investment decisions on behalf of such entity, and not acting for his own personal account.

UK Brokerage Accounts – Financial Promotions

12

If you happen to have a brokerage account for a UK Entity...

12

UK Brokerage Accounts – Financial Promotion Requirements

HNW Company Assessment & Declaration internal form and related evidence from the client must be on file prior to opening account.

Account may be opened in ISG, after completing HNW Company Assessment & Declaration form (internal form) and obtaining related evidence required from the client.

Requirement applies to entity accounts only

Form must be:

Signed by RM, Business Manager, BSO, & Investment Specialist

Stored as part of client record

Updated annually

Above requirements will be enforced by BSO as part of the Foreign Account Approval Process.

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The following information relates to the documents which will be required for the client to be serviced under exemption.

13

A Financial Promotion Disclosure Letter must accompany any financial promotion made in writing to HNW Company UK entity brokerage clients. This disclosure requirement does not apply to financial promotions made orally. Financial Promotions must come from ISG Investment Specialists only (see table below for specifics).

In Person delivery of written financial promotion to HNW Company UK Brokerage clients (entity clients) is not permitted.

When provided in writing, must:

Be sent by email

Include a Financial Promotion Disclosure Letter as additional attachment
UK Brokerage Accounts – Financial Promotion Requirements

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Financial

Promotion Type

Description

Requirement

(Investment Specialist)

Requirement

(Supervisory)

Client-specific recommendation

Security recommendation or investment strategy recommendation directed to a single client.

Populate fields of Financial Promotion Disclosure Letter and include as a separate attachment

When reviewing marketing material, ISG Supervisor must:

Confirm whether recipient is UK client

Remind Investment Specialist to attach Disclosure Letter to email to UK client

Review correspondence with client to confirm Disclosure Letter was attached

Review correspondence with client to confirm Disclosure Letter was attached

Recommendation to multiple clients

Security recommendation or investment strategy recommendation directed to multiple clients.

Populate fields of Financial Promotion Disclosure Letter and include as a separate attachment

When reviewing marketing material, ISG Supervisor must:

Confirm whether recipient is UK client

Remind Investment Specialist to attach Disclosure Letter to email to UK client

Review correspondence with client to confirm Disclosure Letter was attached

Review correspondence with client to confirm Disclosure Letter was attached

Client-ready marketing material

Pre-approved marketing document available on WM Intranet, sent as is to client

Populate fields of Financial Promotion Disclosure Letter and include as a separate attachment

When reviewing marketing material, ISG Supervisor must:

Confirm whether recipient is UK client

Remind Investment Specialist to attach Disclosure Letter to email to UK client

Review correspondence with client to confirm Disclosure Letter was attached

Review correspondence with client to confirm Disclosure Letter was attached
Client-ready marketing material
Pre-approved document available on WM Intranet, with content selected then sent to client.
e.g. Opportunistic Ideas
Populate fields of Financial Promotion Disclosure Letter and include as a separate attachment
When reviewing marketing material, ISG Supervisor must:
Confirm whether recipient is UK client
Remind Investment Specialist to attach Disclosure Letter to email to UK client
Review correspondence with client to confirm Disclosure Letter was attached
Review correspondence with client to confirm Disclosure Letter was attached

Appendix A - EEA Client Declaration Form

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Reverse solicitation evidence is required for all new EEA accounts via EEA Client Declaration, found on WM Portal Forms page.

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IMPORTANT NOTES WHEN WORKING WITH SCREENSHOW'S

SAVE AS .PPTX ONLY

PRINTING INSTRUCTIONS

In order to print correctly, ensure the following print settings are used:

Color/grayscale: Color (regardless of printing in b/w)

Scale to fit paper: ON

Print hidden slides: OFF

WORKING WITH CHARTS: BEST PRACTICE

Charts should use MS Graph. Note there are still printing issues when trying to print in greyscale. The best way to work with charts is:

Copy MS graph objects off the edge of the slide

Open charts by right-clicking on the MS Graph object and select: Chart Object > Open

Make required edits

Copy the MS Graph object and paste as a picture : Home > Clipboard > Paste > Paste Special > Picture (Enhanced metafile)

Position the chart on the slide and ungroup (Ctrl + Shift + G). This enables printing in greyscale

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A disclaimer is not usually required for screenshows. However, it may be required depending on the presentation's contents/use. Users should consult Legal/Compliance as required.

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