

Monthly Reverse Solicitation Review

On a monthly basis on or about the 15th of each month, review "inflow" transactions above \$1M from identified EEA accounts (non-Germany) to confirm if appropriate "Cross Border Call Note" is available in dbForce with details of reverse solicitation evidence. If not available, will escalate to BM Team for further research and resolution. (X:\BSOPWM\RIA Surveillance\Reverse Solicitation - Monthly)

Update dbInsight "New EEA Clients (excluding Germany)" list:

In dbForce, run and export the report called "BSO New EEA Customers" (Note: no filtering is necessary)

Compare this list of accounts to the previous month's file "EEA non-German acct list compare" which is the xls version of dbInsight account list called "New EEA Clients (excluding Germany) list"

Using vlookup, first identify which accounts/clients need to be added to the dbInsight list (they are on the new list but not on the old list). Then identify which accounts/clients need to be removed (they are on the old list but not on the new list).

Add or remove accounts/clients, as appropriate, in the DBInsight list "New EEA Clients (excluding Germany)" list.

Identify appropriate EEA transactions for review:

In dbInsight, for the previous month, run the report "EEA Reverse Solicitation"

Insert a new column A and label "BSO"

Filter for Transaction Total inflows greater or equal to \$1M

Further filter columns Transaction Type and Transaction Code for the following:

Cash Receipt

Free Receipt

Federal Funds Received

Deposits/Other Credits

???

???

???

Highlight identified transactions

Verify that reverse solicitation evidence has been documented in a Cross Border Call Notes:

In dbForce, open the customer

Go to the activity history related list

Click on the subject of the cross border call note dated approximately the date of the transaction

Review comments for explanation of reverse solicitation – ensure it is clearly stated that the transaction was not solicited. The note should also include a description of the who/what/where/when.

Review the "Who initiated contact?" field, ensure it was customer and not DB employee

If everything is in order, enter comments as such in the BSO column – if escalation is necessary, continue to part 4

Escalation process:

If no evidence or no explanation is found in the call note escalate per the following:

Send email to business managers (Table below) with the following: "It was detected a significant inflow for an EEA account was executed. I reviewed the cross border call notes and could not find any reverse solicitation explanation. Please follow up with banker where reverse solicitation was documented and revert back"

Business Manager Escalation Table:

Business Manager Name

Business

Armen Brash

US Onshore

Armen Brash/Janet Morales

Latam

Sylvia Junghardt

GAT

Ensure that reverse solicitation documentation is in dbForce for all large inflows

Document all escalations with comments in the BSO column

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