

MIFID II - Remaining EEA Countries (Excl Germany & UK) – Evidence Document
Finding ID: GFMS 90-017/2019 #43 (dbTrack2407699)

Evidence # 1: Daily Middle Office Exception Report

Description: Daily automated report distributed to Middle Office to ensure that EEA brokerage accounts are only serviced on a reverse solicitation basis. The report contains 4 worksheets described below:

Sheet 1: The accounts on this worksheet are coded EEA on dbForce, but are not coded EEA on NetX. Must code EEA on NetX

Sheet 2: The accounts on this worksheet are coded EEA on NetX, exist on dbForce, but are not coded EEA on dbForce. Must uncode EEA NetX

Sheet 3: Organized Entity accounts where NetX is not coded "UK HNW Company" and dbForce EEA Country contains UK. Check if CA is outside of CSC and if yes, confirm HNW Company Exemption form is on file. The following CSG CA Numbers are excluded: DOL, GGC, EHM, WAM, L6S, EMP, EIS, MUR, A3B, EEA, A1D. Accounts coded "EEA Exception Approved" on NetX are excluded

Sheet 4: Brokerage accounts where NetX is not coded "UK HNW Company" and dbForce reflects EEA. Check if CA is outside of CSC and if yes, confirm HNW Company Exemption form is on file or Notes reflect EEA exception was approved. The following CSG CA Numbers are excluded: DOL, GGC, EHM, WAM, L6S, EMP, EIS, MUR, A3B, EEA, A1D. Accounts coded "EEA Exception Approved" on NetX are excluded

Attachments:

Daily email with Middle Office Exception report

Daily Middle Office Exception report

Evidence # 2: Mismatch EEA Report

Description: outlines EEA client identification mismatches between dbForce and IT logic to identify EEA clients. Worksheet 3 has the mismatches and related comments.

Attachment:

Mismatch EEA Report

Evidence # 3: EMEA Legal & Compliance approvals

Description: selected a sample of EEA lead/prospects and clients for which US compliance facilitated approvals from EMEA Legal & Compliance. The following testing was performed for the selected record:

Confirm if KYC was approved

Confirm if EEA fields were updated in dbForce

Confirm reverse solicitation evidence

Attachment: To be added

Evidence # 4: Sample of KYCs approved from Feb 1 through April 10

Description: report outlines KYCs approved from Feb 1 through April 10. A sample was selected to perform the following testing:

EEA determination

EEA classification/tracking

Confirmation of reverse solicitation, if required

Attachments: To be added

For internal use only

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EEA_Mismatch_Rep
ort.xls

Copy of
EeaV3Changes (002) - M0 Brokerage Exception Report.xls