

1. The client may continue to conduct trades and transactions in existing accounts without Compliance pre-approval, provided that the business has determined these transactions do not involve any unusual and/or suspicious activity or are in a size that is unusually significant or a novel structure.
2. Consistent with this, CB&S may also “open” accounts to facilitate activity as a booking matter where the activity has already been approved in AWM.
3. In addition, the business will need to monitor for any further developments in connection with the reputational risk of this client relationship and to review transaction/activity conducted in the accounts for any activity, size or structure as described in #1 above.

Many thanks, Jan

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