

3. If a customer is deemed as EEA customer, ABR/AFC will update the "EEA Client Type" field of the customer profile by selecting "Retail", and the EEA Country field should be updated accordingly.



4. Scenarios for AFC and ABR to reach out to the FO/CM for KYCs where Primary Decision Maker has not been designated:

#	Acct Type	Scenario	FO reach out Yes/No?	Conclusion
1	Individual/Joint	No POA	No	Account holder is Primary Decision Maker and does not need to be designated.
2	Individual/Joint	With POA(s)	Yes	Primary Decision Maker should be designated.
3	Entity	One POA listed	No	POA is Primary Decision Maker and should be designated.
4	Entity	Multiple POA listed	Yes	Primary Decision Maker should be designated.

"Primary Decision Maker" is defined as the person responsible for making decisions on behalf of the client on the particular account. If a Primary Decision Maker residing in an EEA country is designated on any of the account holder's accounts, the account holder will be subject to EEA restrictions on all of its accounts.

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.

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