

Review of clients with increased likelihood of error of judgement vs. WM risk appetite

Areas of Specific Review

- 1 Clients flagged with negative media against them
- 2 Clients that went through escalation
 - CAF (Client Acceptance Forum)
 - WM RRAP (Rep Risk Assessment Process)
 - RRRC (Regional Rep Risk Committee)
 - Event Driven Reviews
- 3 Clients that solely bank with WM ("last man standing?")
- 4 Clients whose files contain certain key words

Data Sources

- System based identification e.g. in US (TBD in other BCs)
- Bottom-up checks to validate the system-based info (i.e., from market heads and teams)

- BC files (few CAF cases)
- WM DCO Inventory
- Historic inventory
- TBD

- No system based info available
- File specific searches

- TBD re technical feasibility outside the US

Likely Population

- All HR clients (globally ~7K)
- Some portion of MR / LR
 - e.g. if 20% MR → 2.3K
 - if 10% LR → 3.9K

- Less than 100 cases
- TBD

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