

AML/NCA File Assessment – Overview

The DBUS AML Compliance Unit ("AML Unit") will conduct *AML/NCA File Review Assessments* ("File Reviews") for the following business lines and/or account types on either a monthly or a quarterly basis:

- Global Markets, Client Adoption Group (monthly)– see Appendix A
- Global Markets, TALF specific (monthly) – see Appendix B
- Commercial Real Estate (quarterly) – see Appendix C
- Global Banking (quarterly) – see Appendix D
- MortgageIT, Broker specific (quarterly) – see Appendix E
- MortgageIT (quarterly) – see Appendix F

The Appendices (A through F) detail requirements for the business lines / account types.

The reviews will evaluate the adequacy of the CIP/AML relevant processes performed. These monthly/quarterly File Reviews are designed to assess controls instituted as well as any escalation for higher risk accounts as defined by DBUS AML Policy.

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