

<[REDACTED]>; Daphne Cales <[REDACTED]>

**Subject:** 2018 KYC Case Manager [I]

Classification: **For internal use only**

Hi Vijay

In line with the 2018 KYC Target Operation Model, you are being assigned to take on the role of KYC case manager supporting Terri and her team

I have attached a list of the customers that are in scope for KYC in 2018.

As case manager, you are responsible for managing and driving the completion of KYCs, working with the banking team, by the due date defined in the attached (**column M** in the spreadsheet); ultimate ownership over the KYC remains with the Banker. I have listed key activities below which will require liaising with the banking team, Client On-Boarding and the Research team in Jaipur.

Please note that for those customers where the comments in **column P** indicate an account is closing / closed, or exclude please confirm with the Terri and her team as a KYC will not need to be performed if closing.

- **Paper KYC:** Entry of KYC information (from Paper File); prior KYC was performed prior to digitization.
- **Case Preparation:** Initial KYC updates (already in KYC format) or Enter information in KYC format (if there is not a prior KYC).
- **Good Standing Certificate:** US Entity – Look on the Secretary of State website; Non US Entity
- **Source of Wealth:** Document SOW (info obtained from On-line, the client, legal docs, etc.). Provide Summary to Banker / RC to review
- **Google Search:** Perform a google search on Account Holders and UBOs.
- **Due Diligence / Research:** PEP, Lexus/Nexus / Negative news (Systems/ DBs used: PCR, RDC, BIS). – submit requests to the Jaipur team and perform initial review of results (Central Mailbox PWM BIS-Research ([REDACTED]))
- **Update KYC:** Update existing KYC (e.g. when % ownership changes, new signers, etc.)
- **Questionnaires:** Complete GBSA and Volker Questionnaires. – Liaise with Client on-boarding who complete the questionnaire (Central Mailbox [REDACTED]). Refer to email attachment.

Please reach out with any questions

Kind Regards

Adrienne  
[REDACTED]