



# EMEA ACCOUNT OPENING GUIDE

AML requirements are governed by Bank of America Global Enterprise AML Policy and Procedures, and local regulatory laws, which are subject to from time to time.

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This guide gives you a comprehensive summary of the information you need when opening accounts and completing documentation for your banking solution with Bank of America. You will find key contact information, an indication of the regulatory and documentary requirements in the many jurisdictions, as well as guidance on the steps to take in order for the accounts to become operational.

## Your implementation begins with an account

Your bank account acts as the conduit for all the other elements of our proposed solution. Payments and receipts flow through the account. Liquidity is consolidated through and into accounts. Billing is calculated at the account level.

The account is central to everything we do, and so it is important to get it right. It is also one of the reasons account opening is subject to a lot of scrutiny both within the bank, and from regulators.

## Documentation with assistance

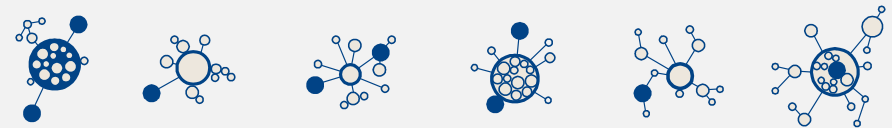
Whenever you have bank documentation to complete, a designated Documentation Consultant will source the relevant paperwork. We will complete as much of it as we can on your behalf, and guide you through the elements that require your input. We manage the documentation process to reduce the time it takes to open the account.

We continue to simplify and improve our documentation. Our [Global Client Account Agreement<sup>1</sup>](#), covers account opening for all countries in EMEA and Asia where we provide accounts and allow multi-entity execution, e-signature, e-statement delivery, and are future-version 'proofed'.

Finally, we are multilingual — we don't expect you to translate all constitutional documents such as Certificates of Incorporation or Trade Register extracts, into English, we are able to accept documents in one of the core European languages, for example German, French, Italian or Spanish, and we will confirm if an English translation is necessary.

<sup>2</sup> Available in English, Korean, Simplified Bahasa and Chinese

## Account structures can be complex...



## ...our implementation is not

We will support you throughout the process of account opening, and completion of all other documentation required. Your first client experience with Bank of America will set the standard for the entire relationship, so we know we have to get it right first time.

## Our commitment

Our proactive and supportive approach to on-boarding has resulted in a reduction in the time our clients spend on collating information and completing our documentation. This has been achieved through well timed and relevant guidance and communication with our clients during the account opening process and our continuous review of the overall on boarding process to ensure we remain as streamlined as possible.

This guide is part of our commitment to make the process straightforward for you, by giving you a head start on the documentary requirements.

# The regulatory environment

## Safeguarding your interests

Anti-money laundering laws and regulations in all jurisdictions are designed to protect participants within the financial system, including you, from financial and reputational loss, as well as benefiting wider society through minimising the risk of criminal and terrorist activities occurring. Therefore, Bank of America takes its responsibilities in this regard very seriously.

Compliance with applicable laws and regulation, while providing the simplest and most efficient client experience, is our priority.

## Know Your Customer

Regulators require us to be entirely satisfied with our understanding of our clients' identities, including beneficial ownership management structures, and usual transaction flows. This process enables us to better understand you, and therefore better meet your needs. We have to do this for all our clients to comply with our legal and regulatory requirements.

## Safeguarding your interests

The practical implication when first establishing a relationship is that we require more documentation than just our account opening forms. We will need to verify your corporate identity, as well as the personal identity of major shareholders and authorized signatories, amongst other records. The actual documentation required will vary depending on country of incorporation, type of entity, and ownership.

## Navigating the regulations

A designated Documentation Consultant will collate the documentation required according to the many variables that can affect what is required. They will, therefore, need to develop a complete understanding of your circumstances, including corporate structure, ownership and domicile. They will then be equipped to determine the appropriate documentation necessary and draw up a checklist of required additional documentary evidence to support the account opening. They may also source for you those documents that are publicly available.

# Account Opening Documentation

## Basic documentation

There are certain documents that must be provided when opening an account with Bank of America, which are explained below:

**Global Client Account Agreement (GCAA)** – This forms the terms and conditions governing your accounts<sup>1</sup> in 25 jurisdictions. Using as much information as we have gathered during our discussions with you, the GCAA is prepared on your behalf by our Documentation Team.

**Evidence of authority of signatories of the GCAA** – This will be in the form of Board Resolutions, Powers of Attorney or extracts from Trade Registers, depending on the country of incorporation of the legal entity; the way you decide to set yourselves up and manage your business.

**Specimen Signature Document<sup>2</sup>** – Forming the mandate, this list of authorized signatories on each account is used for check issuance, to set up direct debit mandates, and manual payments in contingency scenarios. We will also need to verify the identity of signatories.

**Tax declarations** – Such as statement of tax, corporate identity, FATCA, CRS, other relevant tax forms, depending on the type of entity and country of incorporation etc.

**Valid Government ID document** – Containing full legal name, ID number, date of birth and clear photograph e.g. Passport

## Corporate identity

In line with Anti-Money Laundering requirements, we will either source or request the following additional documentation:

**Constitutional documents** – Such as Certificate of Incorporation, Memorandum and Articles of Association, bylaws, Limited Liability Operating Agreement, Certificate of Registration, or other similar documents relating to the constitution of the legal entity. Typically these are sourced by Bank of America.

**Evidence of your registered office and business address.**

**Information relating to your shareholders and management** – We will need to identify beneficial owners, authorized signers, shareholders and directors or managers, with documentary evidence.

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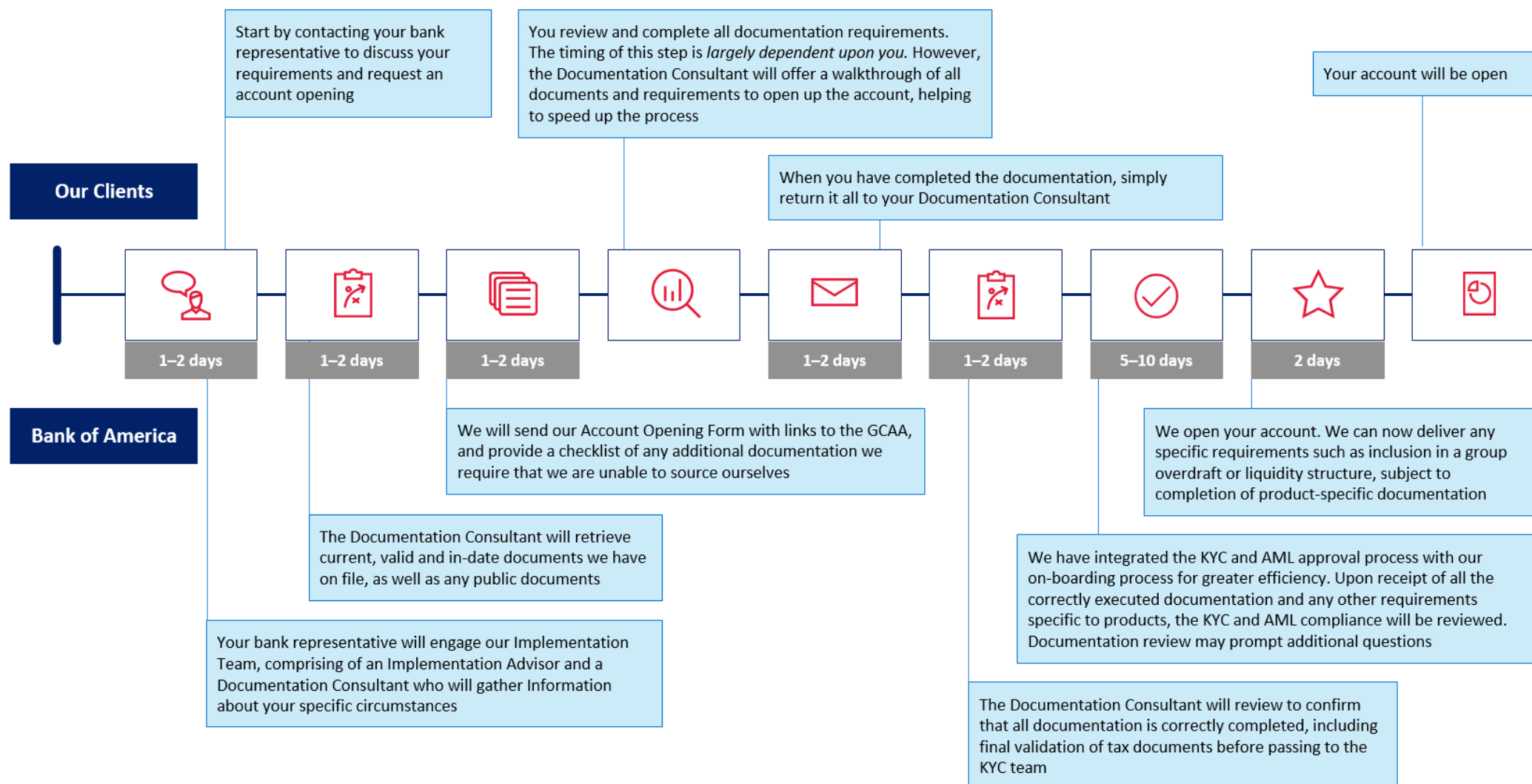
<sup>1</sup> Governs accounts internationally except for Brazil and the US. Refer to the [GCAA](#)

<sup>2</sup> Optional



# Account Opening Documentation

This flow diagram is an average example and typical timeframe of the EMEA account opening process for a brand new relationship with Bank of America. Timelines are indicative, and depend on full co-operation between all parties. Once a relationship has been established, additional accounts for the same legal entity, and with the same signatories, and within the same jurisdictions can be opened within two working days.



## Ownership

Ownership determines the extent to which we have to verify the identity of shareholders and managers. These things can be a matter of public record for companies listed on certain Stock Exchanges, and so some documentary requirements may not be required in certain jurisdictions.

## Country of incorporation

This mainly impacts the types and amount of constitutional documents required to verify the corporate identity, and what evidence is required to verify the authority of those who sign the Global Client Account Agreement.

## Domicile of account(s)

This affects matters relating to local regulations. The most obvious is Anti-Money Laundering.

## Frequently asked questions by clients

### What is the Global Client Account Agreement (GCAA)?

The Global Client Account Agreement is a single document which governs the establishment and operation of accounts in 25 jurisdictions. Accounts are requested via an Account Opening Form (AOF) which has a [hyperlink](#) to the full terms (the GCAA). The AOF is signed by an authorized representative of your company. It provides the important information required for us to open the account, such as the registered name of the company, registered address and ownership structure.

Also included in the GCAA are the general terms and conditions that will govern the account, and any local conditions that apply for the country or countries where you are opening accounts.

### What is the Specimen Signature Document?

A Specimen Signature Document is required for all those authorized to sign checks and manual payment instructions within an organization. It specifies who has signing authority on an account and provides sample signatures for verification purposes. The Specimen Signature Document does not state who is authorized to open or close bank accounts (refer to page 3).

### Why do I have to provide identification documents such as copies of passports?

Passports are a form of identification widely used across the banking industry. Anti-Money Laundering laws and regulations require that banks verify the identities of beneficial owners, senior managers, and signatories. (Refer to page 3).

The following are the minimum; not conclusive list of AML/KYC documentation requirements for opening accounts in EMEA.

## Requirements for All Companies

### Requirements

Confirmation of below information via email or via template letter provided by Bank of America:

- Registered and business address;
- Nature of business and Country of operations;
- Where 50% or more of the funds being used in the relationship with the bank originates from;
- On whether the Company has operations in or engage in or have specific business plans to engage in dealings, transactions or any other type of activity, directly or indirectly, with any Sanctioned Countries and/or Sanctions Target;
- Doing business as (“dba”) or a trading as name, if any;
- Purpose of account;
- Source of funds; and
- Whether the entity can issue bearer shares.

Letter to be dated within the last 12 months and signed by the Director / Company Secretary / Deputy Company Secretary / Compliance Officer / Legal Counsel (external or internal)) / C-Suite Management / Treasurer / appropriately authorized KYC team whose specific role is to provide such information (e.g. KYC/CDD Team or Reverse KYC Team) stating full legal name, title, contact details and confirming provided details are valid and correct.

**Optional** <sup>1</sup>List of Authorized Signatory/Authorization/Specimen Signature document page including a copy of the official document (e.g. Power of Attorney, Board Resolution or any such equivalent i.e. Articles) verifying designation of the Legal Representative (e.g. Directors) granting the authority to those names on the Signatory List.

If the above is provided - For each signer who has payment authority on the Authorization/ Specimen Signature document, the following will be required<sup>2</sup>:

- Full legal name **and**
- Date of birth **or** Residential address **or** Government issued ID number.

<sup>1</sup>Signature specimen/ signature mandate may be mandatory for certain on boarding jurisdictions – please see Account Opening Checklist.

<sup>2</sup>Additional identification and verification requirements may apply depending upon on boarding jurisdiction – please see Account Opening Checklist.

## Requirements for All Companies cont/d.

### Requirements

#### List of Legal Representatives including:

- A copy of the official document verifying designation of the legal representative(s) (i.e. Power of Attorney, Board Resolution or any such equivalent i.e. Articles):
- Full legal name **and**
- Date of birth **and** Residential address **or** country or residence.

#### Note:

If the onboarding entity has a sole Legal Representative who is also the sole Authorized Signer/Signatory on the Signature Mandate regardless of the payment authority, the individual will be treated as a Beneficial Owner – Please see identification and verification requirement for Beneficial Owner below.

List of current Directors/ General Partners/ Managers or equivalent including  
Full legal name **and** Date of birth **or** Residential address **or** Government issued ID number<sup>3</sup>

List of Senior Persons: please confirm whether in addition the Directors listed on the Trade Register there is/ are any individual(s) who is/are responsible for the day to day operations of the entity, including:

- Full legal name **and**
- Date of birth **or** Residential address **or** Government issued ID number<sup>3</sup>

**OBO Declaration Letter:** Confirmation via template letter provided by Bank of America or email on whether the onboarding entity is using its Bank of America account(s) to make payments or conduct transactions on behalf of another entity of the group, including details of the beneficial owner (natural person) on whose behalf such payments or transactions are being conducted. To be signed by Company Secretary or equivalent (Director, if there are no Company Secretary) or Legal Counsel (external or internal) or equivalent (Compliance Officer, if there are no Legal Counsel) or appropriately authorized KYC team whose specific role is to provide such information (e.g. KYC/CDD Team or Reverse KYC Team).

#### For US Entities:

- W-9 or relevant W-8 Tax Form

## Additional Requirements for Public Companies

### Requirements

Latest Audited Annual Report.

<sup>3</sup>Additional identification and verification requirements may apply depending upon on boarding jurisdiction – please see Account Opening Checklist.

## Additional Requirements for Subsidiaries of Public Companies

Requirements
Evidence that the Onboarding Entity is majority-owned (75% + 1 share) by an entity listed on a BAC Approved Stock Exchange via: <ul style="list-style-type: none"><li>– Parent Company's Latest Audited Annual Report or</li><li>– Email confirmation or</li><li>– Organizational Chart showing percentage of ownership up to the listed entity, signed and dated within the last 12 months along with confirmation that the details are valid and correct.<sup>4</sup> To be signed by Company Secretary or equivalent (Director, if there are no Company Secretary) or Legal Counsel (external or internal) or equivalent (Compliance Officer, if there are no Legal Counsel) or appropriately authorized KYC team whose specific role is to provide such information (e.g. KYC/CDD Team or Reverse KYC Team).</li></ul>
Confirmation on Ultimate Parent Company including: <ul style="list-style-type: none"><li>– Full legal name and</li><li>– Physical/Business address; or</li><li>– Government issued Identification number</li></ul>
Latest Audited Annual Report
<ul style="list-style-type: none"><li>– Certificate of Incorporation or Trade register dated within the last 3 months</li><li>– Memorandum &amp; Articles of Association or any equivalent governing document, evidencing the legal framework under which the entity operates along with confirmation that the document is most current and valid.</li></ul>

<sup>4</sup> An organization chart may be mandatory for some on boarding jurisdictions – please see Account Opening Checklist.

## Additional Requirements for Privately Owned Companies

### Requirements

Beneficial Ownership confirmation via:

- Email confirmation or
- Organizational Chart showing percentage of ownership up to the listed entity, signed and dated within the last 12 months along with confirmation that the details are valid and correct.<sup>5</sup>

For each beneficial owner(s) the below information is required:

- Full Legal Name;
- Date of birth;
- Country of residence or residential address;
- Source of Wealth;
- Answer to the SPF/PEP Questions: Have you or any of your immediate family ever been elected, appointed or assumed any political position in a National, State, or Provincial government?" (Y/N) If yes, describe the position. Please note that the below positions are also included and provide Y/N answers to these positions:
  - Directors, deputy directors and members of the board or equivalent function of an international organization (e.g., United Nations);
  - Mayors of cities (irrespective of the size of the city's population);
  - Members of the governing bodies of political parties;
  - Senior local or regional public official with the ability to influence the awarding of public contracts;
  - Decision making member of high profile sporting bodies;
  - Individual that are known to influence the government and other senior decision makers;
  - A "close associate" any of the following persons: (1) Any individual who has joint beneficial ownership of a legal entity, or a legal arrangement, or close business relationship, with a PEP/SPF; (2) Any individual who has sole beneficial ownership of a legal entity, or legal arrangement set up for the actual benefit of a PEP/SPF.
- Confirmation on whether the Beneficial Owner(s) have any association with the following sectors: Construction; or Pharmaceutical and healthcare; or Arms trade and defense; or Extractive industries (consists of any operations that remove metals, mineral and aggregates from the earth); or Dealers in precious metals.

The above information to be provided via:

- Company Registry (if all the details are stated on there) or
- PDF of company headed paper or email confirmation dated within last 12 months and stating full legal name, title and contact details of the verifier provided by Company Secretary or equivalent (Director, if there are no Company Secretary) or Legal Counsel (external or internal) or equivalent (Compliance Officer, if there are no Legal Counsel) or appropriately authorized KYC team whose specific role is to provide such information (e.g. KYC/CDD Team or Reverse KYC Team) confirming that the provided details are valid and correct or
- ID/Address Document (*see ID/Residential Address on the Glossary*)

<sup>5</sup> An organization chart may be mandatory for some on boarding jurisdictions – please see Account Opening Checklist.

**Note:**

If a 25% shareholder is a Trust or if ownership is held by a number of Trusts below 25% or more but with common parties who cumulatively hold an interest of 25% or more then the following information is required:

- Relevant parts or redacted version of Trust Deed(s) or supplements together with the cover page and the signature page setting out the information required including the below information:
  - For the Trust: full name, nature/type of trust, purpose and object of the trust and the country of establishment
  - Full Legal Name of each Settlor or Grantor, Trustee, Controller or Protector and all Vested Beneficiary(ies)
  - For each Settlor or Grantor, Trustee, Controller or Protector and all Vested Beneficiary(ies) the following information confirmed in PDF of company headed paper or email confirmation stating full legal name, title, contact details and confirming provided details are valid and correct by the Trustee or Legal Counsel of the Trust must be provided: (Please refer to the above for “For each Beneficial Owner”).
- If Trustee or Controller or Protector is a Corporate Entity then the below information is required:
  - Evidence of appointment of current Directors/Individuals with authority to represent the Corporate Trustee/Protector to act for the Trust(s) is required
  - For each Director refer to the above requirements for “For each Beneficial Owner”
  - Beneficial Ownership information of the Corporate Entity as per above.

If a 25% or more shareholder is a Fund or if ownership is held by a number of Funds below 25% or more but with common beneficial owner (i.e. investor) who cumulatively hold an interest 25% or more, the Fund level ownership should be confirmed by one of the following individuals clearing stating the full name, title and contact details:

- Investment Manager
- Fund Administrator
- Company Secretary, Compliance Officer, Legal Counsel (external or internal) of the onboarding entity with the attestation that this has been confirmed by the Fund or Fund’s IM/IA stating full legal name, title and contact details.

**Confirmation on Ultimate Parent Company, including:**

- Full legal name and
  - Physical/Business address; or
  - Government issued Identification number
- 
- Certificate of Incorporation or Trade register dated within the last 3 months
  - Memorandum & Articles of Association or any equivalent governing document, evidencing the legal framework under which the entity operates along with confirmation that the document is most current and valid.

## Acceptable Documents/Sources and signing authority

Unless explicitly stated otherwise or specified on the tailored and current documentation requirement list provided by your Implementation Advisor, information can be provided as valid and correct by:

- Company Secretary or Compliance Officer or Legal Counsel (external or internal) or appropriately authorized KYC team whose specific role is to provide such information (e.g. KYC/CDD Team or Reverse KYC Team)
- Via PDF of company headed paper OR email confirmation dated within 12 months stating full legal name, title and contact details.

Note: AML requirements, acceptable documents/sources, certification, ID and residential address documents, documents issue dates and signing authority may vary per EMEA on boarding jurisdiction. Home Base Rules may also apply. For more details please see jurisdictional requirements for account openings.



## Bearer Shares:

Refer to an equity security that is wholly owned by whoever holds the physical stock certificate. The issuing firm neither registers the owner of the stock, nor does it track transfers of ownership.

## Change in Company Details:

Please advise if there have been any changes to the company name or details that have not yet been reflected at the relevant public registry of companies at the time we sourced this information. If this occurs, additional information may be requested.

## Beneficial Owner(s):

Any individual who:

- ultimately owns or controls (whether through direct or indirect and/or on a cumulative and an aggregate basis ownership or control, including through any contract, arrangement, understanding, relationship, bearer share holdings or by other means) 25% or more of the shares or voting rights in the entity.
- exercises ultimate control over the entity and/or the management of the entity (i.e. able to appoint or remove Directors or equivalent officer) despite being neither a shareholder nor a director (e.g. a family member)
- Where there are no individuals identified in the two bullet points above, the CEO or one equivalent person - a single individual with significant responsibility to manage or direct the entity is to be treated as the Fall Back Beneficial Owner.

Note: It is mandatory to answer the above points together with exact percentage of ownership or control.

## Board of Directors or equivalent:

The individuals who are appointed to manage the Entity as per the Entity's Constitutions.

## Certification:

Unless explicitly stated otherwise, certification of all documents can be provided by Notary Public or Commissioner of Oaths; Company Secretary (or a Board Member i.e. a Director); Solicitor, lawyer or attorney (including in-house legal counsel who are appropriately qualified); Chartered or Certified accountant (including in-house CFO who is appropriately qualified); External auditors; Compliance Officer; A Government department, embassy, consulate, or high commission from a country on the list of approved exchanges and regulators; A Company Secretary employed by a company listed on a BAC Approved Exchange; or A senior officer from a financial institution that is regulated by a BAC Approved Regulator. Such certification must include the signature (or seal), legibly printed name of the person providing certification,

title/capacity of the person providing certification and contact address and telephone number of the certifier together with the wording "true copy of the sighted original document" (or equivalent).

## Country (ies) of operations:

All the location(s) you generate 20% or more revenues will be your country (ies) of primary operations. If there are none with 20% or more, then please provide the country where you generate most of revenues from.

## Data Protection Notice ("DPN"):

The DPN link in our d in the link our Global Banking and Markets (GBAM) Privacy Notice [DPN](#) this privacy Notice is in addition to other privacy notices related to other services Bank of America EU/UK Entities provide to clients and individuals. The notice explains how we collect, use and disclose personal data online and offline in connection with the services we provide to our corporate and institutional clients. We provide this Privacy Notice so that you can ensure that individuals connected with you (such as your third party representatives, employees, officers, directors, shareholders, and other related individuals) are notified by you about how a Bank of America EU/UK Entity handles personal data which is provided to it or it otherwise obtains. Other privacy notices may be provided which are specific to the services Bank of America EU/UK Entities provide to clients and individuals. Please make these notices available to your head of compliance or legal.

## ID/Residential Address:

If an acceptable ID document\* and/or Country of Residence or Residential Address document\*\* is provided to satisfy full legal name and date of birth and country of residence or residential address, the document should be certified as True Copy of Original by Company Secretary or Compliance Officer or Legal Counsel (external or internal) or Notary Public (external or internal) or appropriately authorized KYC team whose specific role is to provide such information (e.g. KYC/CDD Team or Reverse KYC Team), or a Bank of America employee (solely on the provision that they have sighted the original documents) stating full name, title and contact details.

\*Valid ID document (certification to be dated within 12 months):

- Passport; or
- Driving License; or
- National ID Card

\*\*Country of Residence or Residential Address document (any of the below dated and certified within the last 6 months):

- Utility Bill; or

- Bank Statement; or
- Official documentation issued by the local tax authorities; or
- Household insurance/automobile insurance certificate or renewal document

## Legal Representatives (Persons Purporting to Act on behalf of the Customer (PPTA):

- Any individual(s) who establish a new business relationship or extend an existing business relationship with the Bank of America. This includes those individual(s) who have the power/authority to perform such legal acts and those individual(s) who performs such legal acts by signing relevant legal agreements with the Bank of America; or
- Any individual(s) authorized to appoint transactional signatories.

## Nature of Business:

This is the main line of business of the onboarding entity.

## Physical/Business Address:

The physical address is the physical location of the principal place of business or local office. Mailing addresses such as Post Office boxes, private mailboxes at a Commercial Mail Receiving Agency, and general delivery addresses are not considered physical addresses.

## Purpose of Account and Source of Funds of the account(s):

The purpose of account and source of funds requirement is a description of how the account(s) will be used, and for what type of transactions, on a day-to-day basis, as well as the origin of the monies expected to be coming into the account(s). The description will cover where money flowing into the account(s) is coming from and why, and where money exiting the account is going to and why. It is expected that this will be broadly in line and compatible with the nature of the Company's business and operations. Some common uses of the account(s) and source of funds include: local corporate taxes, staff payroll, day-to-day operating and business expenses, office space rental, equipment purchases, receipts from customers for products sold or services rendered, payment/receipt of dividends from/to subsidiaries/parent Company, to finance acquisitions or restructuring costs.

"Payables and receivables" or "Operating account" or "Banking purposes" and other statements with similar vagueness would not be sufficient. The description will be required for each account being opened.

## Self-certification:

Self-certification on verification of the appointment of Board of Directors is not acceptable unless the position of the signer (i.e. the Director) can be externally verified via public sources or from an official source (Regulator's or other official Government website).

Self-certification of Beneficial Ownership information is not acceptable, and must be evidenced or confirmed by a relevant Third Party.

## Senior Persons:

The individuals responsible for the day to day operations of the entity, i.e. C-suite. For certain clients the Directors may be considered as the Senior Persons, *i.e. senior persons and directors may be the same*. There is no minimum number of persons to be identified and we could encounter certain clients where these persons are the directors, i.e. senior persons and directors could be one and the same.

## Senior Political Figure/Politically Exposed Person ("PEP"):

Answer to: "Have you or any of your immediate family or close associate\* ever been elected, appointed or assumed any political position in a National, State, or Provincial government?" (Y/N) If yes, describe the position. Please note that the below positions are also included and provide Y/N answers to these positions:

- Directors, deputy directors and members of the board or equivalent function of an international organization (e.g., United Nations);
- Mayors of cities (irrespective of the size of the city's population);
- Members of the governing bodies of political parties.
- Senior local or regional public official with the ability to influence the awarding of public contracts;
- Decision making member of high profile sporting bodies;
- Individual that are known to influence the government and other senior decision makers.

\* A "close associate" any of the following persons: (1) Any individual who has joint beneficial ownership of a legal entity, or a legal arrangement, or close business relationship, with a PEP/SPF; (2) Any individual who has sole beneficial ownership of a legal entity, or legal arrangement set up for the actual benefit of a PEP/SPF.

## Source of Funds:

Source of Fund means a description of the economic activity that generates income for the Client i.e. where will the funds come from in order to open an account or undertake a transaction, to finance or continue financing the account(s)/products/relationship established with Bank of America.

## Source of Wealth:

Source of Wealth means the origin of the person's total net worth, this may include but is not limited to employment, sale of property, securities, investments or inheritance. A description explaining how the person acquired their wealth (i.e. total net worth) should be sufficient.

## Translations:

Translations of all official documents must be made by an official translator and certification of the translation should bear the appropriate stamps of the issuing body, including the name and signature of the translator and dated. Translations may also be certified abroad in accordance with the usual Hague Convention Apostille practices.

## Ultimate Parent Company:

For an Entity Customer other than a fund, the ultimate Legal Entity (i.e., the company not majority-owned by another company) that owns a majority of a Legal Entity that is a Customer and is not itself a subsidiary of another legal entity (i.e. it is not majority owned and/or controlled by another Legal Entity).

## Requirements for Subsidiaries of Public Companies

- Austria
- Belgium
- Czech Republic
- Denmark
- Finland
- France
- Germany
- Hungary
- Ireland
- Italy
- Luxembourg
- Netherlands
- Norway
- Poland
- Portugal
- Slovakia
- Spain
- Sweden
- Switzerland
- United Kingdom

## Disclaimer

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