



Artificial Intelligence in Banking:

The Future Is Now

In collaboration with



Importance of AI in Banking + *Financial Services*

Delivering a positive client experience is the key to unlocking success across the global financial sector. To put it simply, banks perform well when their customers do. In fact, a recent McKinsey study found higher degrees of customer satisfaction drive higher assets under custody.¹

As financial institutions continue to embrace the next generation of technology, they are looking to real-time and tailored services, transparency and speed of information as well as a high level of security. Artificial intelligence (AI) has applications across the spectrum of these functions and enables banks to deliver optimal experiences for their clients. In successfully unlocking these capabilities, McKinsey estimates that AI technologies could potentially deliver up to \$1 trillion of additional value for banks each year.²

¹ [Reimagining Customer Engagement for the AI Bank of the Future](#). McKinsey. 2020.

² [AI-bank of the future: Can banks meet the AI challenge?](#) McKinsey. 2020.

Identifying & Understanding the Rewards of AI

While the use of AI in the financial services industry is still in its early stages, the technology in combination with traditional data sources and has the potential to provide invaluable insights to inform and accelerate human decision-making and enterprise-wide growth.

Harnessing the power of AI, banks and financial institutions can:



CREATE AND LEVERAGE BETTER INTEGRATED DATASETS

Large global financial institutions have traditionally struggled to access and integrate data siloed across various teams and systems. As organizations migrate their data from “on-premise” locations into the cloud, technology managers are seeking data management platforms that can:

- Leverage machine learning to provide greater flexibility and agility across data types as volumes grow
- Deliver quicker ways to onboard new data to create actionable fit-for-purpose data models
- Provide data quality management capabilities to easily access information

AI has the ability to solve these challenges. For example, BNY Mellon’s Data Vault, a data management platform exemplifying these principles, leverages machine learning (ML) across disparate datasets to identify trends and patterns in the data to unearth insights. The analysis provided can help client service teams better inform their clients about strategies that may enable better financial decisions. It can also be applied to internal processes, helping managers to operate more efficiently.



IMPROVE THE CUSTOMER EXPERIENCE

Financial institutions are eager to use AI’s enhanced ability to provide more tailored customer experiences, transparency into transactions and 24/7 client support across the globe. Conversational agents and chatbots provide the opportunity to supplement support teams in order to enhance client service. These support services create a pathway to build stronger relationships, bolstering reputational outcomes, increasing referrals for new business and driving client retention.



INCREASE OPERATIONAL EFFICACY

Certain AI technologies such as robotic process automation (RPA) and low-code platforms allow teams to automate manual and repetitive tasks. This capability can reduce risk intrinsic in manual processes, creating greater efficiency and opportunities for employees to take on more sophisticated tasks.



ENHANCE RISK MANAGEMENT

AI-powered systems can use machine learning across various datasets to identify risk signals such as insolvency or fraud. Similarly, natural language processing (NLP) can perform sentiment analysis to help a bank identify customers who show signals of dissatisfaction that correlate to a risk of client churn. Accurately anticipating these risks can help client teams make better decisions when issuing loans or knowing with whom they should prioritize engagement.



IMPROVE DATA SECURITY

ABI Research estimates that the financial sector will spend \$96 billion on AI and cybersecurity analytics by the end of 2021.³ As data and cybersecurity become increasingly important, AI-based systems can provide signals that are an effective mechanism against malefactors. The programs analyze customer behavior, location and financial habits to trigger a security mechanism that will detect any unusual activity. The use of AI security systems could present additional ways to help keep client data even safer.



BOLSTER REGULATORY COMPLIANCE

AI provides the potential for financial institutions to navigate complex and changing regulatory guidelines with greater sophistication and efficiency by analyzing data and automating manual compliance processes. These capabilities present tremendous opportunities, as 51% of financial institutions currently report manually managing key regulatory protocols including “Know Your Customer” (KYC) and “Anti-Money Laundering” (AML).⁴ Leveraging AI can help drive efficiencies around these processes, enabling banks and other financial institutions to perform faster and more in-depth screening of enterprises and conduct financial crime discovery and analytics to optimize workflows.

³ [Use of Artificial Intelligence in Banking World Today](#). Finextra. July 29, 2021

⁴ [Transforming Anti-Money Laundering and KYC Controls with AI: Part I](#). Infosys Consulting. January 15, 2020.

Applications of AI in Banking + *Financial Services Today*

As financial institutions continue to implement AI, the industry is seeing increasing opportunities to reshape and optimize business models to deliver sustainable returns. We spoke with Yu Yu, Director of Data Science at BNY Mellon, who leads AI/ML innovation, to understand these trends.

“BNY Mellon is actively adopting AI, such as machine learning and natural language processing across the bank,” said Yu. “We see no shortage of opportunities of applying AI. Our challenge is finding applications which will provide the most impact and ensuring they are scalable across a very large and complex organization.”

While there are hundreds of examples, we’ll focus on a few common examples across institutions:

PREDICTING & FORECASTING BALANCES & PROCESSES FOR OPERATIONAL EFFICIENCIES

AI can forecast and predict potential outcomes in order to better manage money and processes. For example, it can make accurate forecasts for end-of-day balances instead of using historical benchmarks. These predictions, delivered 24 hours in advance, can provide teams lead time to take any market action to either deploy excess cash or add to reserves.



Similarly, AI can help predict settlement fails. BNY Mellon has developed patented machine-learning technology that is designed to predict when Treasury market trades will fail to settle so teams can respond accordingly to perform corrective actions. This helps to avoid disruptions and strengthen resiliency. Financial institutions can also use these capabilities to accurately anticipate the direction and magnitude of lending rate movements for securities to increase lending utilization, ultimately driving revenue for clients.

CHATBOT ADOPTION

Today, many clients still follow traditional processes, such as calling or emailing their bank representative for assistance or inquiries. However, client representatives have limited work hours and/or the client teams that are available may lack the language skills to effectively answer client questions on a global level. Already, institutions across the global financial sector have begun to diversify this technology. At BNY Mellon, we are currently utilizing Selina Bot. Additional organizations embracing similar technology include Bank of America's Erica and Hang Sang Bank's Haro.

Chatbots that use NLP can be easily used to supplement traditional forms of communication so that clients can get real-time information and enhanced support at each level of their customer journey. Chatbots are also well-suited to better manage internal processes and communication. Multiple teams within BNY Mellon have started adopting and enhancing bots with NLP, leveraging advanced entity detection with different platforms, including Microsoft Azure, and incorporating chatbots and AI-driven automation into sales and service on Dynamic 365.

MARKETING & MACHINE LEARNING

In response to clients' requests, BNY Mellon has explored automating the creation of sales and marketing materials. Leveraging a combination of BNY Mellon's Data Vault, and a collaboration with Assette, the solution uses machine learning to quickly review requirements, such as questions within a request for proposal (RFP), and identify related answers and slides based on those requirements. Information is pulled from Data Vault and then inserted into slides to form a customized and tailored PowerPoint presentation. These capabilities ultimately streamline and accelerate the process of responding to client requests and ensures clients are sourcing the most up-to-date data.

DETECTION OF UNUSUAL PATTERNS & ANOMALIES TO STRENGTHEN RISK CONTROL

Machine learning models can utilize intelligent trend detection capabilities to discover unusual patterns and flag anomalous client transactions in near real-time in order to strengthen risk controls. These capabilities can help provide the preemptive remediation needs to mitigate potential risks and circumvent costs associated with corrective action for clients and for the bank. For example, calculated NAV is compared against historical NAV movement ("guardrails") as well as NAV movements of "like funds" ("siblings"). Anomalies are flagged for further investigation and timely resolution. This solution can be expanded for similar controls in bond pricing.

AUTOMATING DOCUMENT PROCESSING

Financial institutions can automate the processing of incoming client instructions received in "unstructured" formats that vary from client to client. BNY Mellon is developing an Azure-based solution to extract and classify key data elements required for downstream processing (such as account number, amount, ABA number, etc.). These AI/ML processes will be designed to help improve processing time, reduce errors and improve client experience.

Evisort: A Case Study in *AI Application in Banking*

The Challenge

Originally, with each new custodial agreement, BNY Mellon tasked a team of lawyers to manually create a new contract based on approved, standardized agreement language and navigate a complex web of internal approvals and escalations. Contracts were sent by email through the approval process, with each lawyer individually reviewing prior changes, making new updates and emailing the updated contract to the next reviewer.

This legacy process repeated itself until the agreement was finalized but came with a potential for gaps in accountability, version control and progress tracking. As a contract was finally executed, multiple review and summary forms then had to be compiled about the details of the agreement. This created additional time to the process contracts to ensure all documentation and compliance was completed. This led to prolonged onboarding periods for the client, resulting in increased costs.



The Solution

BNY Mellon sought to automate the custodial agreement generation process to simplify stages of the review process with AI. We collaborated with Evisort, an AI company backed by Microsoft's M12, that leverages ML and NLP to streamline contract generation, review and management. Evisort customized its artificial intelligence tools to review new custodial agreements based on BNY Mellon's internal rules, guideline and processes.

Evisort then used its AI technology to automatically create customized initial contracts and digitally coordinate with the necessary internal stakeholders for approval of special terms.

Furthermore, Evisort's technology can automatically flag non-standard language and alert the necessary legal team members as well as automate the decision-making process, allowing attorneys to focus on more strategic tasks. For example, for all custody agreements, an attorney needs to fill out a detailed, multi-section worksheet to determine the most appropriate BNY Mellon legal entity to enter into a global custody or depositary agreement with a client. Evisort automates this decision-making process through a simple intake form.

The Benefit

In incorporating Evisort's capabilities, BNY Mellon can now create, tailor, update and track contracts in a fraction of the time. In automating manual tasks, BNY Mellon is able to shorten and help streamline the onboarding process and effectively drive a better client end-experience.

In leveraging AI, BNY Mellon will continue to improve contracting efficiency and established the timely and appropriate escalation of deviations from standard contract language. The datatization of agreements additionally enables the bank to develop an instant "best first draft" that is tailored to each client, decreasing the amount of back and forth necessary in contract negotiations.

Looking Ahead

Embracing the future of AI, BNY Mellon plans to leverage both NLP and ML to monitor risk exposure in contracts by using AI to identify nonstandard contract language, creating an alert system for ongoing obligations, unsigned contracts and/or upcoming renewal dates, as well as continuous monitoring of compliance as regulations change. In addition, AI will allow the bank to better understand common deviations and educate relationship managers on when those deviations are appropriate and best course of action for proper mitigation.

Challenges of AI Adoption in *Banking and Financial Services*

While the benefits are clear, banking and financial services also face unique challenges in adopting AI:

TECHNICAL DEBT AND INFRASTRUCTURE

As financial institutions look to incorporate AI within current systems, more mature organizations may struggle the most. While advanced operations signal more robust and well-embedded infrastructure and a depth of resources, it also means a potential “hangover” for legacy systems and technical debt.

When implementing AI into an organization’s processes, there are often new requirements of data, infrastructure and technology to build and scale new models. This is not only more expensive when replacing large legacy systems, but building and running AI applications can often be compute-intensive, resulting in potentially off-putting upfront costs. Moreover, the most advanced AI platforms come with high costs and benefits that have a longer gestation period, which may deter executives in traditional organizations where the time to see benefits might be longer than their average tenure of one to three years.



GOVERNANCE STRUCTURES & MITIGATION OF NEW RISKS & REGULATION

The implementation of new technology can often be at odds with the highly regulated financial services industry as teams work to meet required client and internal workflows. Risk and compliance teams may notably struggle to understand how to manage new potential vulnerabilities or create the appropriate internal regulations of Explainable AI (XAI) to manage them. Use cases of AI should be reviewed to ensure that the use of AI is applied to an ethical framework and deployed responsibly. Without the right governance, AI can be deployed with unintended consequences, such as denial of access to financial products or privacy breaches. This may result in a rejection of new AI technologies or slow down adoption in financial institutions that lack the governance structures to monitor AI effectively.⁵

BUY VS. BUILD

In the past, financial services companies have deployed custom built technology that can be challenging to maintain and, over time, builds up technical debt. Companies can break this pattern and accelerate deployment by leveraging higher level services such as Cognitive Services or Augmented Machine Learning. This frees up resources to focus on building great financial products and offerings for their customers—rather than custom developing every solution.

AI TALENT

A limited talent pool is one of the biggest roadblocks to the speedy deployment and implementation of AI. As an emerging field, a qualified and experienced workforce within the area of AI is limited. To combat this challenge, many firms are already focusing on strategically building internal teams to develop in-house AI capabilities and supplementing any talent shortages by bringing in external resources and/or buying or licensing capabilities from large technology firms. Firms in the financial services sector are more likely than average to say they're building in-house AI capabilities, which requires internal talent with the right skills.

LACK OF STEWARDSHIP & STRATEGY

In a constantly evolving technology space, senior executives may fail to fully embrace AI amid high costs for new infrastructure, monitoring and human capital. In the race for an organization's budget and senior leadership endorsement, AI may also find itself in competition with other necessary rising technologies such as blockchain or traditional operations. If the vision for AI becomes obscured for an organization's leaders, stewardship will falter and it will become virtually impossible to implement a successful enterprise-wide strategy to effectively utilize these capabilities across a large global organization.⁶

⁵ [Why Most Organizations' Investments in AI Fall Flat](#). Harvard Business Review. October 22, 2020.

⁶ [AI Adoption Advances, but Foundational Barriers Remain](#). McKinsey. November 13, 2018.

*AI in Financial Services in **the Future***

AI is poised to transform the global financial ecosystem. More than 80% of financial services providers believe that AI is important to the future of their organization and one-third believe the technology will increase company revenue by more than 20%.⁷

“Financial services institutions are leveraging AI to transform business processes, differentiate their customer experience and innovate new products,” said Luke Thomas, Head of Banking at Microsoft. “Microsoft Azure AI Cognitive Services and Azure Machine Learning are empowering financial services institutions to develop artificial intelligence solutions for complex processes—such as predicting securities pricing, automating client service requests and processing financial statements—all on the trusted, secure and compliant Azure platform. AI is, and will continue to power the transformation and future of the financial services industry.”

As AI technology continues to gain momentum, organizations will do well to not only look to new capabilities, but to prepare current legacy infrastructures with dynamic fintech and technology partners.

This sentiment is underscored by Mark Casady, Founder and General Partner of Vestigo Ventures and a member of the BNY Mellon Accelerator Program’s Venture Capital Advisory Board.

“AI is the present and the future of financial services,” said Casady. “This is due to a combination of talented engineers coming out of great universities well trained in AI along with easily available data from incumbents and a desire to drive down costs among key players in financial services.”

“Incumbents in financial services should have their data warehouses and data lakes ready to be accessed. This is a critical step to getting the power of an AI technology that can harness that data to drive efficiency and a better outcome for customers.”

⁷ [AI is Enabling Digital Transformation Across the Financial Services Industry](#). Finextra. July 29, 2021.



DISCLAIMER

bnymellon.com

BNY Mellon is the corporate brand of The Bank of New York Mellon Corporation and may be used to reference the corporation as a whole and/or its various subsidiaries generally. This material does not constitute a recommendation by BNY Mellon of any kind. The information herein is not intended to provide tax, legal, investment, accounting, financial or other professional advice on any matter, and should not be used or relied upon as such. The views expressed within this material are those of the contributors and not necessarily those of BNY Mellon. BNY Mellon has not independently verified the information contained in this material and makes no representation as to the accuracy, completeness, timeliness, merchantability or fitness for a specific purpose of the information provided in this material. BNY Mellon assumes no direct or consequential liability for any errors in or reliance upon this material.

The Bank of New York Mellon, a banking corporation organized pursuant to the laws of the State of New York, whose registered office is at 240 Greenwich St, NY, NY 10286, USA. The Bank of New York Mellon is supervised and regulated by the New York State Department of Financial Services and the US Federal Reserve and is authorized by the Prudential Regulation Authority (PRA).

The Bank of New York Mellon operates in the UK through its London branch (UK companies house numbers FC005522 and BR000818) at One Canada Square, London E14 5AL and is subject to regulation by the Financial Conduct Authority (FCA) at 12 Endeavour Square, London, E20 1JN, UK and limited regulation by the Prudential Regulation Authority at Bank of England, Threadneedle St, London, EC2R 8AH, UK. Details about the extent of our regulation by the Prudential Regulation Authority are available from us on request.

The Bank of New York Mellon SA/NV, a Belgian limited liability company, registered in the RPM Brussels with company number 0806.743.159, whose registered office is at 46 Rue Montoyerstraat, B-1000 Brussels, Belgium, authorized and regulated as a significant credit institution by the European Central Bank (ECB) at Sonnemannstrasse 20, 60314 Frankfurt am Main, Germany, and the National Bank of Belgium (NBB) at Boulevard de Berlaimont/de Berlaimontlaan 14, 1000 Brussels, Belgium, under the Single Supervisory Mechanism and by the Belgian Financial Services and Markets Authority (FSMA) at Rue du Congrès/Congresstraat 12-14, 1000 Brussels, Belgium for conduct of business rules, and is a subsidiary of The Bank of New York Mellon.

The Bank of New York Mellon SA/NV operates in Ireland through its Dublin branch at Riverside II, Sir John Rogerson's Quay Grand Canal Dock, Dublin 2, D02KV60, Ireland and is registered with the Companies Registration Office in Ireland No. 907126 & with VAT No. IE 9578054E. The Bank of New York Mellon SA/NV, Dublin Branch is subject to limited additional regulation by the Central Bank of Ireland at New Wapping Street, North Wall Quay, Dublin 1, D01 F7X3, Ireland for conduct of business rules and registered with the Companies Registration Office in Ireland No. 907126 & with VAT No. IE 9578054E.

The Bank of New York Mellon SA/NV is trading in Germany as The Bank of New York Mellon SA/NV, Asset Servicing, Niederlassung Frankfurt am Main, and has its registered office at MesseTurm, Friedrich-Ebert-Anlage 49, 60327 Frankfurt am Main, Germany. It is subject to limited additional regulation by the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, Marie-Curie-Str. 24-28, 60439 Frankfurt, Germany) under registration number 122721.

The Bank of New York Mellon SA/NV operates in the Netherlands through its Amsterdam branch at Strawinskylaan 337, WTC Building, Amsterdam, 1077 XX, the Netherlands. The Bank of New York Mellon SA/NV, Amsterdam Branch is subject to limited additional supervision by the Dutch Central Bank ('De Nederlandsche Bank' or 'DNB') on integrity issues only (registration number 34363596). DNB holds office at Westeinde 1, 1017 ZN Amsterdam, the Netherlands.

The Bank of New York Mellon SA/NV operates in Luxembourg through its Luxembourg branch at 2-4 rue Eugene Ruppert, Vertigo Building—Polaris, L- 2453, Luxembourg. The Bank of New York Mellon SA/NV, Luxembourg Branch is subject to limited additional regulation by the Commission de Surveillance du Secteur Financier at 283, route d'Arlon, L-1150 Luxembourg for conduct of business rules, and in its role as UCITS/AIF depositary and central administration agent.

The Bank of New York Mellon SA/NV operates in France through its Paris branch at 7 Rue Scribe, Paris, Paris 75009, France. The Bank of New York Mellon SA/NV, Paris Branch is subject to limited additional regulation by Secrétariat Général de l'Autorité de Contrôle Prudentiel at Première Direction du Contrôle de Banques (DCB 1), Service 2, 61, Rue Taitbout, 75436 Paris Cedex 09, France (registration number (SIREN) Nr. 538 228 420 RCS Paris - CIB 13733).

The Bank of New York Mellon SA/NV operates in Italy through its Milan branch at Via Mike Bongiorno no. 13, Diamantino building, 5th floor, Milan, 20124, Italy. The Bank of New York Mellon SA/NV, Milan Branch is subject to limited additional regulation by Banca d'Italia - Sede di Milano at Divisione Supervisione Banche, Via Cordusio no. 5, 20123 Milano, Italy (registration number 03351).

BNY Mellon Fund Services (Ireland) Designated Activity Company is registered in Ireland No 218007, VAT No. IE8218007 W with a registered office at One Dockland Central, Guild Street, IFSC, Dublin 1. BNY Mellon Fund Services (Ireland) Designated Activity Company is regulated by the Central Bank of Ireland.

The Bank of New York Mellon (International) Limited is registered in England & Wales with Company No. 03236121 with its Registered Office at One Canada Square, London E14 5AL. The Bank of New York Mellon (International) Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Regulatory information in relation to the above BNY Mellon entities operating out of Europe can be accessed at the following website: <https://www.bnymellon.com/RID>.

The Bank of New York Mellon has various subsidiaries, affiliates, branches and representative offices in the Asia-Pacific Region which are subject to regulation by the relevant local regulator in that jurisdiction. Details about the extent of our regulation and applicable regulators in the Asia-Pacific Region are available from us on request. Among others, The Bank of New York Mellon, Singapore Branch is subject to regulation by the Monetary Authority of Singapore. The Bank of New York Mellon, Hong Kong Branch (a banking corporation organized and existing under the laws of the State of New York with limited liability) is subject to regulation by the Hong Kong Monetary Authority and the Securities & Futures Commission of Hong Kong. The Bank of New York Mellon, Shanghai and Beijing branches are subject to regulation by the China Banking and Insurance Regulatory Commission. The Bank of New York Mellon, Seoul Branch is subject to regulation by the Financial Services Commission, the Financial Supervisory Service and The Bank of Korea.

The Bank of New York Mellon is regulated by the Australian Prudential Regulation Authority and also holds an Australian Financial Services Licence No. 527917 issued by the Australian Securities and Investments Commission to provide financial services to wholesale clients in Australia.

The Bank of New York Mellon Securities Company Japan Ltd, subject to supervision by the Financial Services Agency of Japan, acts as intermediary in Japan for The Bank of New York Mellon and its affiliates, with its registered office at Marunouchi Trust Tower Main, 1-8-3 Marunouchi, Chiyoda-ku, Tokyo 100-1005, Japan.

If this material is distributed in, or from, the Dubai International Financial Centre ("DIFC"), it is communicated by The Bank of New York Mellon, DIFC Branch, regulated by the DFSA and located at DIFC, The Exchange Building 5 North, Level 6, Room 601, P.O. Box 506723, Dubai, UAE, on behalf of The Bank of New York Mellon, which is a wholly-owned subsidiary of The Bank of New York Mellon Corporation. This material is intended for Professional Clients and Market Counterparties only and no other person should act upon it.

Past performance is not a guide to future performance of any instrument, transaction or financial structure and a loss of original capital may occur. Calls and communications with BNY Mellon may be recorded, for regulatory and other reasons.

Disclosures in relation to certain other BNY Mellon group entities can be accessed at the following website: <http://disclaimer.bnymellon.com/eu.htm>.

This document and the statements contained herein, are not an offer or solicitation to buy or sell any products (including financial products) or services or to participate in any particular strategy mentioned and should not be construed as such. This material is intended for wholesale/professional clients (or the equivalent only), is not intended for use by retail clients and no other person should act upon it. Persons who do not have professional experience in matters relating to investments should not rely on this material. BNY Mellon will only provide the relevant investment services to investment professionals.

Not all products and services are offered in all countries.

If distributed in the UK, this material is a financial promotion. If distributed in the EU, this material is a marketing communication.

This material, which may be considered advertising, is for general information purposes only and is not intended to provide legal, tax, accounting, investment, financial or other professional advice on any matter. This material does not constitute a recommendation or advice by BNY Mellon of any kind. Use of our products and services is subject to various regulations and regulatory oversight. You should discuss this material with appropriate advisors in the context of your circumstances before acting in any manner on this material or agreeing to use any of the referenced products or services and make your own independent assessment (based on such advice) as to whether the referenced products or services are appropriate or suitable for you. This material may not be comprehensive or up to date and there is no undertaking as to the accuracy, timeliness, completeness or fitness for a particular purpose of information given. BNY Mellon will not be responsible for updating any information contained within this material and opinions and information contained herein are subject to change without notice. BNY Mellon assumes no direct or consequential liability for any errors in or reliance upon this material.

This material may not be distributed or used for the purpose of providing any referenced products or services or making any offers or solicitations in any jurisdiction or in any circumstances in which such products, services, offers or solicitations are unlawful or not authorized, or where there would be, by virtue of such distribution, new or additional registration requirements.

© 2021 The Bank of New York Mellon Corporation. All rights reserved.

HEDGEMARK

BNY Mellon is the corporate brand of The Bank of New York Mellon Corporation and may also be used as a generic term to reference the Corporation as a whole or its various subsidiaries generally. HedgeMark Advisors, LLC ("HMA") provides dedicated managed account solutions to institutional clients comprising consultative, administrative, middle office, and technological services (directly or through its affiliates), including daily (generally T+1) investment guideline compliance monitoring, and daily holdings-based risk, performance attribution and performance analytic reporting provided by HedgeMark Risk Analytics, LLC. The managed accounts are referred to as "Funds" for purposes of this document. HMA transacts business in the United States and other jurisdictions where it is properly registered, or excluded or exempted from registration requirements.

Funds tailored exclusively for each institutional client and are designed in conjunction with their legal, financial and tax advisors. They do not comprise commingled investment funds for which HMA or any affiliated entity are serving as "sponsor" or "promoter", and interests in the Funds are not being "offered" to such institutional clients by HMA or any affiliated entity. Accordingly, no authorization or licensing from any regulatory authority has been sought in connection therewith.

No representation is made that any Fund's investment process, objectives, goals or risk management techniques will or are likely to be achieved or be successful or that any Fund or any underlying investment will make any profit or will not sustain losses. The risks of investing in a Fund will not be negated by HMA's dedicated managed account services, and no assurance is given that a Fund will not be exposed to risks of significant trading losses.

The information provided herein does not constitute tax, legal, accounting or financial advice. HedgeMark does not provide legal, financial, accounting, tax or portfolio management advice, and prospective clients and investors ("Investors") are advised to seek the counsel of their own legal, financial and tax advisers for all matters relating to the services and structures contemplated herein. Each Investor (either alone or with its professional advisors) is solely responsible for its own due diligence, risk assessment and tolerance, investment objectives, any decision to invest in a Fund, and for monitoring its investment for purposes of determining whether it wishes to remain invested in such product and whether such product continues to be appropriate for its circumstances and requirements.

Interests in Funds will not be insured by the FDIC, the SIPC or any other organization, will not be deposits of any bank, and are not guaranteed by any bank (including BNY Mellon).



RISK DISCLOSURES: An investment in hedge fund investment strategies are speculative and involve a high degree of risk, and are not suitable for all investors. Investors could lose all or a substantial portion of their investment and must have the financial ability, sophistication/experience and willingness to bear the risks of an investment long term. Funds may lack diversification and performance may be volatile. Hedge fund investment strategies commonly include swaps, futures, forwards, options and other derivative transactions that can result in leverage. Leveraging may increase risk. A Fund's fees and expenses may be substantial regardless of any positive return and may offset the account's trading profits. There may be significant restrictions on transferring or selling Fund interests. This statement is not intended to be a complete list of the risks and other important disclosures involved in investing in any Fund.

REPORTING SERVICE DISCLOSURES: HedgeMark provides transparency and risk analytics reporting services (the "Reporting Service"). Use of the Reporting Service is subject to terms and conditions accessible at <https://www.hedgemark.com/TermsAndConditions.html> (the "Terms and Conditions").

©2021 The Bank of New York Mellon Corporation. Services are provided by The Bank of New York Mellon and its various affiliates. All rights reserved.