



DEUTSCHE NUMIS ANTI-MONEY LAUNDERING & COUNTER TERRORIST FINANCING STATEMENT

Money laundering and terrorist financing are identified risks to Deutsche Numis who provide investment banking and execution services to its clients. To control these risks, minimum control standards are defined including, among others, risk-based client due diligence, the monitoring of transactions, name list screening, investigation of alerts and the filing of suspicious activity reports to authorities.

These suspicious activity reports can be triggered by alerts from Transaction Monitoring, internal referrals from employees, enquiries of law enforcement or referrals from other Banks. Further measures include assessing the risk exposure in the client population and reduce the exposure through, for example, terminating relevant client relationships and liquidating or reducing risk in relevant and associated positions.

The Anti-Money Laundering Policy and Know Your Client Policy contain the minimum control requirements and are updated regularly in line with regulatory developments and supplemented with internal safeguarding measures. The Anti-Money Laundering policy outlines e.g., the responsibilities of employees to undertake training, report unusual activity, refer enquiries from authorities to the relevant Money Laundering Reporting Officer (MLRO) or their reporting lines, be aware of channels available to raise concerns and report issues, and keep and retain documentation relating to Anti-Money Laundering.

Relevant employees must, among other things, conduct Due Diligence on their clients, establish the identity and ownership of clients, the purpose and nature of their relationship, provide information on clients, transactions, or parties to the MLRO or their reporting line as requested, and exit or reject clients following instructions from the MLRO.

The additional Know Your Client policy includes, for example, prescribed activities to assess a client's or counterparty's underlying financial crime risk including requirements on the timing of client reviews, due diligence measures at client adoption, and the treatment of politically exposed persons.