

Prevention of money laundering and terrorist financing

AURELIUS has defined Group-wide minimum standards for the prevention of money laundering and terrorist financing. The company's overall risk with regard to money laundering and terrorist financing has been classified as low on the basis of the annual risk analysis. Nevertheless, the Group is aware of the obligations and challenges posed by money laundering. A solid framework has been established to ensure that AURELIUS is not used as a conduit for money laundering.

A risk analysis (customer-related, geographical and business-specific risk factors) forms the starting point for all operational measures to prevent money laundering. It serves to identify the concrete risks of money laundering and terrorist financing in one's own business environment.

In particular, the list of nations listed by the EU Commission as "third countries with a high (money laundering) risk" are included in the risk analysis. The requirements of the 5th EU Money Laundering Directive were also taken into account in internal processes and procedures. Particularly noteworthy here are increased due diligence requirements in the identification of so-called high-risk third-country participations. The data of relevant customers is regularly updated and checked for consistency in order to comply with the due diligence requirements for the prevention of money laundering and terrorist financing.

The Company is committed to preventing money laundering, terrorist financing or breaches of sanctions-related regulations. All relevant employees shall receive training, in particular by explaining the procedure for escalating and reporting suspicious cases. All violations of the law in all jurisdictions in which AURELIUS operates are consistently pursued.

Decisions as to whether business relationships must be terminated due to indications of money laundering and terrorist financing are made at management level.