

General Statement on Observance of Anti-Money Laundering Requirements

Fondsdepot Bank GmbH has its headquarters in Hof, Germany, and is supervised by the German Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht – BaFin).

The Federal Republic of Germany is a member country of the Financial Action Task Force (FATF) and the European Union (EU) and has enacted laws and rules designed to implement the anti-money laundering policies of FATF and the EU. The goal of these laws is to detect and prevent money laundering and potential financing of terrorism.

Fondsdepot Bank GmbH has implemented an Anti-Money Laundering (AML) program that is designed to comply with certain required German AML rules as a minimum standard throughout the bank as well as with the relevant German laws, regulations and guidance relating to the prevention of money laundering, financing of terrorism and related financial crimes. The AML program includes written policies and procedures, a designated AML-Officer, regular training for relevant employees and an independent audit to test the implementation of the program.

Fondsdepot Bank GmbH takes steps to ensure that it complies with any and all embargo regulations applicable in the EU and in the jurisdiction in which any respective branch or office is domiciles. Fondsdepot Bank GmbH obtains lists that are complied on the basis of multiple sources, including the BaFin, the EU and the Office of Foreign Assets Control (OFAC). Fondsdepot Bank GmbH uses its best efforts to ensure compliance with these prohibitions and restrictions and to detect suspicious activities. Depending on the jurisdiction and business line, Fondsdepot Bank GmbH operates technical systems and/or manual monitoring systems to detect potential suspicious activities. Any such suspicious activities detected are reported to law enforcement authorities in accordance with applicable laws.

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