



AML Governance Compliance

Introduction

In the framework of Corporate Governance, statutory anti-money laundering obligations pursuant to § 261 German Criminal Code (StGB) in conjunction with § 4 German Anti-Money Laundering Act (GwG) and based on the official General Authorization issued by the District Government of Düsseldorf, the enforcement measures have been properly conducted and comprehensively documented.

Legal Basis of Enforcement Actions

- § 261 German Criminal Code (Money Laundering)
- § 4 German Anti-Money Laundering Act (AML Act - GwG)
- § 32 German Whistleblower Protection Act (HinSchG)
- § 49 et seq. German Administrative Procedure Act (VwVfG)
- §§ 808 et seq. German Code of Civil Procedure (ZPO)
- § 839 German Civil Code (BGB) in conjunction with Article 34 German Constitution (GG)
- Administrative mandate delegated through official General Authorization by the District Government of Düsseldorf

Mandate and Obligations of the AML Compliance Officer

The appointed AML Compliance Officer is tasked with:

- Providing full transparency under ESG and whistleblower standards according to § 32 HinSchG.
- Preventing and prosecuting systemic money laundering (§ 261 StGB; § 4 GwG);
- Conducting administrative enforcement measures against institutions, authorities and private entities involved in severe compliance violations;
- Enforcing asset seizure, blocking, freezing and liquidation under administrative law;
- Cooperating with national and international law enforcement and supervisory bodies;

Reports are published pursuant to § 32 HinSchG (Whistleblower Act) and serves full transparency under corporate governance standards.