



General Declaration on compliance with anti-money laundering Provisions

Varengold Bank AG has implemented safety measures to combat money laundering, terrorist financing and other criminal actions in accordance with Section 25h of the German Banking Act.

Varengold Bank AG is a corporation domiciled in the Federal Republic of Germany, Große Elbstrasse 14, Hamburg, and as a registered banking institution is overseen by the German Federal Financial Supervisory Authority (BaFin).

The Federal Republic of Germany is a member state of the Financial Action Task Force (FATF) that has enacted laws and regulations to implement the anti-money laundering principles of FATF (and those of the EU). The aim of these laws is to detect and prevent money laundering and potential terrorist financing.

Varengold Bank AG has an anti-money laundering programme to satisfy with the requirements of local anti-money laundering regulations, as well as all local regulations and guidelines concerning the prevention of money laundering and terrorist financing as well as financial crime in the countries where Varengold Bank AG is represented as well as in the countries which jurisdictions are affected by Varengold Bank AG's businesses and transactions. This anti-money laundering programme includes risk analyses, written policies and procedures (of which only applicable parts are translated into English for colleagues abroad) and an appointed anti-money laundering officer. There are regular refresher and updating training courses for employees as well as specific training for the AML officers and Compliance colleagues. Independent audits are conducted to test the effectiveness and correctness of the implemented guidelines and processes.

As part of its anti-money laundering and anti-terrorist financing programme, Varengold Bank AG makes its appropriate measures to ensure that it complies with all applicable financial sanctions and embargo regulations. Varengold Bank AG does its best efforts to comply with these prohibitions and restrictions by monitoring activities with regard to Varengold Bank AG's clients as well as all parties of transactions and detecting and taking appropriate action regarding suspicious transactions.

Please refer to our Wolfsberg Anti-Money Laundering Questionnaire for further details regarding our money-laundering prevention measures.

Kindly refer any further queries regarding Varengold Bank AG anti-money laundering measures to:

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Varengold Bank AG

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Aufsichtsrat: Dr. Karl-Heinz Lemnitzer (Vorsitz) · Michael Stephen Murphy · Alexander Körner