

# Anti-Money Laundering Policy

Doric Asset Finance & Verwaltungs GmbH (Doric), its affiliates and subsidiaries are firmly committed to participating in international efforts to combat money laundering and the funding of terrorist and criminal activities.

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 both the FATF and the EU. The goal of these laws is to detect and prevent money laundering and potential terrorist financing.

The most important requirements, which serve as minimum standards for Doric, are the following:

- Assignment of an Anti-Money Laundering Officer
- Ascertainment of customer identity
- Establishment of the ultimate beneficiary
- Record keeping
- Reporting of suspicious circumstances / transactions to the authorities
- Review of the reliability of the employees
- Regular Training of the employees on Anti-Money Laundering.

Doric has implemented an anti-money laundering programme that is designed to comply with certain required German anti-money laundering rules as a minimum standard throughout the group as well as with all local laws, regulations and guidance relating to the prevention of money laundering, terrorist financing and related financial crimes. These include written policies and procedures, a designated anti-money-laundering officer and training for employees.

An essential part of the Anti-Money-Laundering Policy of Doric is the identification of its customers by official documents and other relevant information. Whenever Doric is required to identify a customer, the ultimate beneficiary (of the account / the cash transaction) must also be established. If doubts remain about whether the person to be identified acts on own account, or in cases, where it is obvious, the person does not act on own account, Doric will take reasonable and appropriate steps to obtain information about the real identity of the person for whom the customer acts.

If reasonable doubts remain about whether a transaction offends Anti-Money Laundering Rules after the background of the customer, the source of the money and the type of transaction have been considered, Doric decides about the termination of the business relationship in general. Suspicious transactions immediately have to be reported to the competent law enforcement authorities including the Financial Intelligence Unit (FIU) in Germany which has been created at the Federal Investigation Office (Bundeskriminalamt).

If you have any questions or require additional information regarding Doric's anti-money laundering efforts, please contact:

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