

General Terms and Conditions of Use for

- entering beneficial owners in the Transparency Register
- submitting notifications of changes to legal entities subject to transparency requirements
- accessing the Transparency Register
- filing applications to restrict access to entries in the Transparency Register
- the automated access procedure („access interface“)
- the provision of information on access granted to the Transparency Register
- reporting discrepancies to the Transparency Register
- exemption from the annual fee for maintaining the Transparency Register
- reactivation notifications for registered associations

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The following General Terms and Conditions of Use apply to notifications of entry (Sections 20; 21 German Anti-Money Laundering Act - GwG) of beneficial owners in the register (Section 3 GwG) (hereinafter: entry in the register), notifications of changes to legal entities subject to transparency requirements (Section 20(2) GwG), access to the Transparency Register (Section 23(1) GwG) kept by Bundesanzeiger Verlag GmbH in its capacity as the registration authority (hereinafter: registration authority) as stipulated in the Ordinance on the Commissioning of Transparency Registers (Transparenzregisterbeleihungsverordnung) (Section 18 et seq. GwG), applications to restrict access (Section 23(2) GwG), the automated access procedure (Section 23(3) GwG), information on access granted (Section 23(8) GwG), reporting discrepancies to the registration authority (Section 23a GwG), reactivation notifications for registered associations as well as exemption from the annual fee for maintaining the Transparency Register (Section 24(1) sentence 2 GwG). Access is possible in accordance with the Ordinance on Accessing the Transparency Register (Transparenzregistereinsichtnahmeverordnung - TrEinV).

1. General remarks

For certain associations and legal structures, in particular legal entities under private law and registered partnerships, as well as for trustees, foundations and associations with legal capacity (hereinafter: "parties subject to a notification obligation"), there is an obligation under Sections 20 and 21 GwG to provide information on the beneficial owner (Section 19 GwG) without delay for entry in the Transparency Register.

The registration authority is to be requested electronically on www.transparenzregister.de to perform the entry.

The information on the beneficial owner is entered in the Transparency Register, provided it is complete and there are no ambiguities or doubts within the meaning of Section 18(3) GwG regarding entry in the register.

To ensure comparability of the information and efficient work processes, the entries in the Transparency Register are kept and made available for access solely in the data format customary at the registration authority.

Further technical details on registration in the Transparency Register and on the transmission of information on beneficial owners are defined in the Ordinance on the Transmission of Data by Parties Subject to a Notification Obligation and by the Operator of the Company Register to the Transparency Register (TrDüV).

The registration authority must be notified electronically of any changes regarding the meta-information relating to the legal entity subject to transparency requirements (Sections 20(2), 21(1b, 2) GwG) on www.transparenzregister.de. The electronic forms provided on the website are to be used for this purpose.

Reactivation notifications must be submitted electronically to the registration authority at www.transparenzregister.de. The electronic forms provided on the website are to be used for this purpose.

2. Registration / Notification of entry / Changes to legal entities subject to transparency requirements

Prior to initial entry of beneficial owners, the issue of reactivation notifications and submitting notifications of changes to legal entities subject to transparency requirements, a registration process must be successfully completed with the registration authority.

Registration requires a permanently valid e-mail address enabling constant and reliable communication with the holder of the user account. After registration, the e-mail address will be required when signing in on the website of the Transparency Register (cf. Section 1(2) sentence 1 TrDüV).

The use of a provisional e-mail address intended for temporary use only (known as disposable, fake or trash e-mails) is not permitted for registration with the registration authority. Registrations carried out with a provisional e-mail address may be rejected during the registration process or blocked after registration. If rejected or blocked, a new complete registration process with a permanently valid e-mail address will be required for making entries in the Transparency Register, reactivation notifications or to submit notifications of changes to legal entities subject to transparency requirements.

Details of this registration process are available on the website www.transparenzregister.de.

3. Registration / Access / Information on access granted / Reporting discrepancies / Exemption from the annual fee for maintaining the Transparency Register

Registration for:

- accessing the Transparency Register
- the automated access procedure („access interface“)
- information on access granted to the Transparency Register
- reporting discrepancies to the Transparency Register
- exemption from the annual fee for maintaining the Transparency Register
- reactivation notifications for registered associations

is only possible on the Transparency Register website www.transparenzregister.de.

To register, the user or a person acting on behalf of the user shall provide an electronic identifier in the form of a permanently valid e-mail address and select a password. The following minimum registration data must also be provided to the registration authority:

- if it is a natural person registering,
 - (a) first and last name,
 - (b) e-mail address and telephone number; and
 - (c) address and, where different, billing addressand
- if the registration is being carried out for a non-natural person,
 - (a) company name or name of the non-natural person,
 - (b) address of the registered office of the non-natural person and, where different, billing address,
 - (c) first name and last name of the natural person carrying out the registration and
 - (d) e-mail address and telephone number of the natural person carrying out the registration.

If the registration data changes (Section 2(4) TrEinV), the corresponding information must be changed in the user account without delay. The registering person or the (non-natural) person for whom the registration is

being carried out shall prove their identity by means of suitable evidence as per the registration authority's requirements during the registration process or when applying for access, reporting the discrepancy or requesting information on access granted. If the file upload procedure is chosen for this purpose, the evidence shall be transmitted to the Transparency Register as electronic data formats in the form of PDF documents.

PDF documents must be clearly readable, copyable and printable. The PDF document may not be transmitted in combination with other data formats as an electronic application.

PDF documents must meet the following requirements:

- Security options must be deactivated
- Documents must not be encrypted
- JavaScript is not permitted
- Forms are not permitted
- The document must be printable in DIN A4 portrait or landscape format and meet the following size requirements:
 - Maximum height: 297 mm
 - Minimum height: 279.4 mm
 - Maximum width: 216 mm
 - Minimum width: 210 mm
- Documents must not exceed the maximum size of 10 MB.
Up to 300 documents with a maximum total size of 100 MB can be transmitted.

Suitable proof of identity

- for natural persons is
 - (a) a copy of a valid official identity document containing a photograph of the holder which meets the domestic passport and identity document requirement, in particular
 - aa) a copy of a domestic passport, identity card or passport or identity card substitute; or
 - bb) a copy of a passport, identity card or passport or identity card substitute recognised or approved in accordance with the provisions relating to foreigners,
 - (b) a copy of the documents stipulated under Section 1(1) of the Payment Account Identity Verification Ordinance (Zahlungskonto-Identitätsprüfungsverordnung)
 - (c) one of the forms of proof listed under Section 12 (1), sentence 1, no. 1 – 4 GwG

and

- for non-natural persons is
 - (a) a copy of one of the documents listed in Section 12(2) nos. 1 and 2 GwG; and
 - (b) the Legal Entity Identifier (LEI) as a valid identifier for legal entities.

4. Entries in the register

a) Entry of the beneficial owner in the register / electronic submission form

The party subject to a notification obligation or the third party commissioned to perform the notification (hereinafter: third party) may only use the electronic submission forms provided by the registration authority on www.transparenzregister.de for entry in the register. This is the only way to duly request entry in the register. The entries must be possible based on the information provided on the electronic form, be comprehensible, and the information on the beneficial owner (Section 19 GwG), including the period during which the status as beneficial owner existed or exists, must be clearly and immediately identifiable.

The inclusion or transmission of graphics is not permitted.

b) Illegal requests and similar / right of enquiry pursuant to Section 18(3) GwG

aa) By requesting entry in the register, the registering association or registering legal structure or the person acting on its behalf (hereinafter: registrant) represents and warrants that it is authorised to request entry in the register.

bb) Entry requests whose contents are in violation of laws, official regulations or accepted principles of morality will not be carried out. For such requests and for the associated transmitted data, documents and records which are obviously not intended for entry in the register or as other documents or which do not comply with the submission formats, the registration authority shall have no obligation to return or retain these.

cc) Information on the beneficial owner may not be entered in the Transparency Register and made available for access if it is incomplete or if there are ambiguities or doubts with regard to the notification/entry within the meaning of Section 18(3) GwG and if these have not been conclusively clarified by the party subject to a notification obligation or a third party by the deadline set by the registration authority.

dd) Requested entries will be made without delay, provided none of the aforementioned or legal impediments exist.

The data transmitted shall not be changed by the registration authority but shall be entered as transmitted in the request.

The party subject to a notification obligation or the third party shall be provided with an electronic notification of receipt of the entry request when the request is made.

c) Changes to or cancellations of requests prior to entry in the Transparency Register

Changes to or cancellations of requests may be made prior to entry in the Transparency Register.

Changes to or cancellations of requests are to be initiated electronically by the registrant via the Transparency Register. The procedure for changes or cancellations provided by the registration authority on the Transparency Register website (www.transparenzregister.de) is to be used for this.

d) Corrections after entry in the Transparency Register

Once the entry in the Transparency Register has taken place, it is only possible to correct the entry. In this case, the original entry will remain in the Transparency Register and the correcting entry will be entered in the Transparency Register with reference to the original entry. This means that deletions or partial deletions are not possible, including for content that has been submitted and entered beyond the legally required information.

e) Fees for entries / fees for changes, cancellations or corrections

Entries are not subject to a fee.

Changes to and cancellations of requests and requests for corrections are not subject to a fee.

5. Notifiable changes to legal entities subject to transparency requirements

Only the electronic submission forms provided by the registration authority on www.transparenzregister.de can be used for notifications of changes to legal entities subject to transparency requirements. This is the only way to duly request a change notification.

For legal entities not listed in registers and that are subject to transparency requirements, the changes cited

in Section 20(2) GwG are subject to a notification obligation.

6. Accessing the Transparency Register

The Transparency Register can only be accessed on www.transparenzregister.de.

The accessing party or the person acting on behalf of the accessing party may only use the electronic application forms provided by the Transparency Register at www.transparenzregister.de to request access. This is the only way to duly request access to the Transparency Register.

The application must specify for which association under Section 20(1) GwG or for which legal structure under Section 21(1) and (2) GwG and for which period or date the party requesting access is requesting access to the Transparency Register.

If a public authority files an application to access the Transparency Register pursuant to Section 23(1) sentence 1 no.1 GwG, it must confirm that access is necessary for the performance of its statutory duties.

If an obliged entity submits a request to access the Transparency Register pursuant to Section 23(1) sentence 1 no. 2 GwG, it shall state, that the inspection is for purposes of meeting its own due diligence obligations.

If a request is submitted to access the Transparency Register pursuant to Section 23(1) sentence 1 no. 3 GwG, a legitimate interest in the inspection must be demonstrated.

Once the application to access the register has been processed, the party requesting access will be notified by e-mail.

If access to the Transparency Register is granted, the applicant may purchase the documents for the requested date or period on the Transparency Register website for a fee. Once the purchase process has been completed, the documents will be available to download for five days.

If access is denied, the applicant may download the notification denying application on the Transparency Register website.

7. Information on real estate in accordance with Section 19a GwG based on Section 23 GwG

Pursuant to Section 19a GwG, the Transparency Register makes the information set out in Section 19a GwG based on Section 23 GwG regarding associations under Section 20(1) GwG that are registered as the beneficial owners of real estate in section I of the land register accessible for inspection (local court having jurisdiction, land register district, land register page number, all properties entered in the inventory of the land register page (in each case with the land-register sub-division, plot and parcel), type and scope of beneficial ownership, start and end of beneficial ownership).

8. Applications pursuant to Section 23(2) GwG "overriding legitimate interests"

Applications to restrict access pursuant to Section 23(2) GwG are governed by the Ordinance on Accessing the Transparency Register (Transparenzregistereinsichtnahmeverordnung - TrEinV). They must be made in writing stating the grounds.

The evidence required under the TrEinV must be submitted. Applications for restriction of access may be submitted electronically or by post.

Applications for restriction of access by post should be sent to:

Bundesanzeiger Verlag GmbH
Transparenzregister
Postfach 10 05 34
50445 Köln

Electronic applications for restriction of access should be sent to:

antrag-beschaenkung@transparenzregister.de

9. Automated access procedure in accordance with Section 23(3) GwG (the so-called access interface)

The automated access procedure is exclusively available to the authorities courts and the bodies stated in Section 2(4) GwG , as well as to the obligated persons stated in Section 23(1) sentence 1 no. 2 GwG, towards whom restriction of access and transmission pursuant to Section 23(2) sentence 4 GwG is not possible, for the fulfilment of their statutory duties or due diligence obligations.

Access pursuant to Section 23 (1) GwG shall remain unaffected by the automated access option.

The use of the access interface is only possible after prior online registration and detailed registration at www.transparenzregister.de and after activation by the registration authority. Pursuant hereto, the user shall demonstrate that it meets the requirements for the use of the automated access procedure.

Automated retrieval is only possible using accredited software. Pursuant hereto, the user may use software that has already been accredited or have its own software accredited according to the specifications of the registration authority. If the user uses non-accredited software, the user may be denied or deprived of automated access.

The user shall act to ensure that the necessary technical and organisational measures are taken to ensure data protection and data security. In particular, the user must guarantee the confidentiality and integrity of the data.

If there are any doubts that the automated retrieval or access is necessary for the fulfilment of the statutory duties of an authority, a court or one of the bodies stated in Section 2(4) or for the fulfilment of the duty of care of an obliged person, the automated access possibility may be blocked. The registration authority may request the authority to confirm that access is necessary for the fulfilment of statutory duties. Confirmation shall be issued by the supervisor. The obliged person may be instructed that Section 23 (1) GwG, which applies to all obliged persons, shall apply to the obliged person for the entire term as well.

10. Information on access granted to the Transparency Register

Applications requesting information on access granted to the Transparency Register can only be filed on the homepage of the Transparency Register www.transparenzregister.de in accordance with the rules of the registration authority.

The applicant (beneficial owner) or the third party tasked with filing the application may only use the electronic application forms provided by the Transparency Register on www.transparenzregister.de to file the application. This is the only way to duly request information on access granted to the Transparency Register.

For this purpose, the beneficial owner or a third party tasked with filing the application must first register the beneficial owner to file the application. The association pursuant to Section 20 GwG or the legal structure pursuant to Section 21 GwG for which information is being requested must be indicated. In addition to this,

the beneficial owner must demonstrate their identity as well as their status as the beneficial owner of the legal entity for which the information is being requested by providing suitable evidence. Suitable evidence is the evidence defined in Section 12 GwG.

11. Reporting discrepancies to the Transparency Register

Discrepancies can only be reported to the Transparency Register on the Transparency Register website www.transparenzregister.de.

The registration authority enables obliged entities under Section 23(1) sentence 1, no. 2 GwG and the authorities stated in Section 23a(1) s. 3 GwG to report discrepancies within the meaning of Section 23a(1) sentence 4 GwG to the Transparency Register.

a. Reporting the discrepancy

The reporter of the discrepancy may only use the electronic reporting forms provided by the Transparency Register on www.transparenzregister.de to report it. This is the only way to duly report discrepancies to the Transparency Register.

b. Other documents / PDF upload

In addition to the reporting form(s), the proof of identity documents cited under clause 3 are to be transmitted to the Transparency Register as electronic data formats in the form of PDF documents using the upload procedure, unless this already took place during registration.

The file properties of the PDF documents must comply with clause 3.

12. Exemption from the annual fee for maintaining the Transparency Register

Exemption from the annual fee for maintaining the Transparency Register is possible on www.transparenzregister.de.

If the legal requirements are met, the registration authority shall grant associations under Section 20 GwG an exemption from the annual fee for maintaining the Transparency Register upon application pursuant to Section 24(1) GwG. Only associations under Section 20 GwG serving a tax-privileged purpose within the meaning of Sections 52 to 54 of the German Fiscal Code (AO) shall be eligible to file an application. The registration authority shall not charge any fees to associations under Section 20 GwG if the pursuit of taxed-privileged purposes under Sections 52-54 AO results directly from the Charity Register (Zuwendungsempfängerregister) in accordance with Section 60b AO.

Under Section 4(3) Transparency Register Fees Ordinance (TrGebV), the application pursuant to Section 24 (1) sentence 2 GwG has no retroactive effect. An exemption for previous fee years is consequently not possible.

The procedure for filing an application is governed by Section 4 of the Transparency Register Fees Ordinance (TrGebV). In the case of a written application, the application form provided by the registration authority must be used.

13. Reactivation notifications for registered associations

Only the electronic entry forms of the registration authority are provided for reactivation notifications for registered associations at www.transparenzregister.de. This is the only way to properly submit a reactivation notification.

For registered associations, the registration authority will create an entry in the transparency register in accordance with Section 20a GwG on the basis of the data entered in the register of associations, without any notification from the association itself being required. Within the scope of this entry, all natural persons of an

association listed in the current printout in the register of associations under 3 b) (authorised representatives and special powers of representation) will be recorded as legal representatives. With Germany as the country of residence and as the only nationality, the nationality will be assumed to be German. Automatic registration will not take place if a notification initiated by the association has already been submitted. In such cases, automatic registration can be re-initiated by submitting a reactivation notification.

The registration authority will not check the entries in the register of associations for correctness and completeness of content.

Incorrect automatic entries must be corrected by notifications of corrections.

14. Applicability of statutory regulations and official language

For the remainder, the German Anti-Money Laundering Act (GwG) and the Ordinances on the Transparency Register, as amended from time to time, shall apply.

German is the official language.

15. Exclusion of payment by cheque

Fee payments by cheque are excluded.