

System Description

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# Compliance Screening

Legal regulations and available restricted party lists

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AEB

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# 1 Change history

| Date       | Modification  | Chapter<br>(please cross-reference) |
|------------|---|-------------------------------------|
| 18.02.2020 | Footnotes added to Entity List and List of Nonproliferation Sanctions   | 3.1.3 (▶ page 8)                    |
| 18.02.2020 | New US list SAM (System for Award Management Exclusions)  | 3.1.3 (▶ page 8)                    |
| 18.02.2020 | Dow Jones: "SOR" sanctions package renamed "SCO"  | 3.3 (▶ page 19)                     |
| 08.05.2020 | Ministry of the Dutch list corrected to Ministerie van Buitenlandse Zaken   | 3.1.1 (▶ page 4)                    |
| 19.10.2020 | Current pricing model implemented   | Various                             |
| 04.02.2021 | Description of CFSP List updated  | 3.1.1 (▶ page 4)                    |
| 04.02.2021 | Section "UK lists" extended and existing BOE and UKUASL lists moved here, new UKSL list added                               | 3.1.2 (▶ page 7)                    |
| 04.02.2021 | New MEUL list added; SDN list extended by further sanctions programs; OFAC-CSL list extended by a new restricted party list | 3.1.3 (▶ page 8)                    |
| 04.02.2021 | Descriptions of the BANZEU, BANZUS, and BANZDIV lists updated   | 3.2 (▶ page 18)                     |
| 08.02.2021 | Descriptions of UKUASL and UKSL lists improved  | 3.1.2 (▶ page 7)                    |
| 14.05.2021 | OFAC-CSL list extended by new restricted party list   | 3.1.3 (▶ page 8)                    |
| 06.07.2021 | New DFAT list added   | 3.1.7 (▶ page 16)                   |

## 2 Against which restricted party lists should an EU-based company screen?

### 2.1 EU regulations against which to screen

Generally, companies with headquarters in the EU only need to consider those restricted party lists/denied-party lists that are mentioned in the EU embargo regulations or in national law.

There are two types of embargo regulations against whose annexes a company's business partners must be screened. On the one hand, these are embargoes on individuals as defined in the "anti-terrorism regulations", EU Regulations Nos. 881/2002 (ISIL (Da'esh) and Al Qaida), 2580/2001 (terror suspects), and 753/2011 (Afghanistan) including all amendments to these regulations.

On the other hand, there are EU embargo regulations for countries which include lists of names, e.g. for countries such as Iran, Iraq, Congo (Democratic Republic), North Korea, Sudan, etc.

On the website of the responsible authorities of the EU member states, you can find the anti-terrorism regulations as well as an up-to-date list of all country-specific embargo regulations, some of which include lists of names in their annexes: [http://www.bafa.de/DE/Aussenwirtschaft/Ausfuhrkontrolle/Embargos/embargos\\_node.html](http://www.bafa.de/DE/Aussenwirtschaft/Ausfuhrkontrolle/Embargos/embargos_node.html)

### 2.2 US restricted party lists against which to screen

The United States asserts worldwide authority for its export control laws. Companies with headquarters in the EU are recommended to also screen their business partners against US sanctions lists, called "Black Lists".

Companies whose activities fall under US jurisdiction must ensure that they comply with the provisions of this jurisdiction. In the US, a multitude of Black Lists with various backgrounds and legal consequences exist. Only some of them claim global applicability.

### **3 Which lists does AEB currently offer in the Compliance solution?**

AEB offers you an automatic update service as an integral part of your AEB Compliance solution. This update is a fully automated background process without the need for any user interaction. AEB updates the current versions of the restricted party lists daily and maintain them for you on a central server in the AEB data center.

Currently, the extensive international list content is available to you as detailed in the following. This list content is extended continuously. Additionally, AEB is working with some partner companies that also provide lists for various countries.

Which lists your application checks depends on your license agreement. The scope of the update service is thus tailored to your company's individual needs.

### 3.1 Lists offered in the AEB data service

#### 3.1.1 EU lists

##### European External Action Service (EEAS)

| List   | Description   | Relevance  | Price category      | Material number |
|--|---|--|---------------------|-----------------|
| <b>CFSP</b><br>Consolidated Financial Sanctions List | Consolidated list of all persons, groups, and entities subject to EU financial sanctions. The CFSP list is the official EU database. It includes the financial sanctions from the anti-terror regulations, the country-specific embargo regulations, and other sanctioning regulations such as those against cybercrime or serious human rights violations. | For companies with headquarters in the EU, screening against the CFSP list is mandatory. | Included in license | –               |

##### Council of the European Union

| List   | Description  | Relevance   | Price category      | Material number |
|--|--|---|---------------------|-----------------|
| <b>EURUDU</b><br>EU – Russia embargo:<br>Restrictions for dual-use goods intended for listed organizations | This list contains Russian organizations concerned by the sanctions laid down in light of Russia’s actions to undermine Ukraine’s stability. The list contains the entries of annex IV of Council Regulation (EU) No. 833/2014 of July 31, 2014, and amended by Council Regulation (EU) No. 960/2014 of September 8, 2014. | Screening against this list is recommended for all companies with headquarters in the EU and dual-use business in Russia. | Included in license | –               |

| List  | Description  | Relevance  | Price category      | Material number |
|---|--|--|---------------------|-----------------|
| <b>EURUKM</b><br>EU – Russia embargo:<br>Restrictions on access to the capital market | It lists Russian entities that are more than 50% state-owned and are subject to the sanctions laid down with respect to Russia's actions contributing to Ukraine's destabilization. The list consolidates the entries of annex III of Council Regulation (EU) No. 833/2014 of July 31, 2014, and of annexes II and III of the related amending regulation 960/2014 of September 8, 2014. | Screening against this list is recommended for all companies with headquarters in the EU and in business with securities and money-market instruments in Russia. | Included in license | –               |

#### France – Ministère de l'Économie et des Finances

| List                                 | Description  | Relevance   | Price category | Material number |
|--------------------------------------|--|---|----------------|-----------------|
| <b>FRNL</b><br>French Sanctions List | The French sanctions list contains all persons and organizations subject to EU financial sanctions or UN Security Council sanctions, as well as all persons and organizations deemed by the French authorities to be linked to terrorist acts. | Recommended for companies governed by French law. | A              | D601009         |



### Netherlands – Ministerie van Buitenlandse Zaken

| List  | Description   | Relevance  | Price category | Material number |
|---|---|--|----------------|-----------------|
| <b>NLNST</b><br>Nationale sanctielijst terrorisme | The Dutch restricted party list (Nationale sanctielijst terrorisme) complements the EU financial sanctions and lists persons and organizations involved in terrorist activities. Under Sanctions Regulation No. DJZ / BR / 1222-07 of December 18, 2007 (“Sanctieregeling terrorisme 2007-II”), all assets of the listed persons and organizations are frozen. This means that they can no longer access their money or use their bank accounts and credit cards. This makes it more difficult for these people to commit terrorist acts or to participate in them (financially). | Recommended for companies governed by Dutch law. | A              | D601010         |

### Belgium – Federal Public Service FINANCIAL SERVICES (FPS)

| List   | Description   | Relevance  | Price category | Material number |
|--|---|--|----------------|-----------------|
| <b>BENS</b><br>Belgian National Sanctions List | The Belgian restricted party list complements the EU financial sanctions and lists persons and organizations associated with terrorist activities. All funds and economic assets of the listed persons and entities are to be frozen without any delay and the direct or indirect provision of funds and economic assets to these persons and entities is prohibited. | Recommended for companies governed by Belgian law. | A              | D601011         |

### 3.1.2 UK lists

#### HM Treasury – The UK government's economic and finance ministry

| List   | Description   | Relevance  | Price category | Material number |
|--|---|--|----------------|-----------------|
| <b>BOE</b><br>Consolidated List of Financial Sanctions Targets in the UK                                   | Database of all listed persons, groups, and entities subject to financial sanctions by the UN and the UK.   | For companies with headquarters in the UK, screening against the BOE list is mandatory.      | A              | D601007         |
| <b>UKUASL</b><br>List of entities subject to capital market restrictions (former Ukraine Sovereignty List) | The List of entities subject to capital market restrictions, provided by HM Treasury, lists Russian entities that are more than 50 % state-owned and are subject to the sanctions laid down with respect to Russia's actions contributing to Ukraine's destabilization. These sanctioned organizations are subject to other financial and investment restrictions and are therefore not included in the OFSI Consolidated List of Financial Sanctions Targets in the UK (BOE list). The list consolidates the entries in Schedule 2 of the Russia (Sanctions – EU Exit) Regulations 2019. | For companies with headquarters in the UK, screening against the UKUASL list is recommended. | A              | D601008         |

### Foreign, Commonwealth & Development Office

| List                      | Description  | Relevance  | Price category | Material number |
|---------------------------|--|--|----------------|-----------------|
| UKSL<br>UK Sanctions List | <p>With the UK Sanctions List, the British government provides a list of persons, entities, or means of transport that are subject to both financial sanctions and restrictions on entry, trade, and other restrictions depending on the respective national sanctions regimes of the United Kingdom. This is based on the Sanctions and Anti-Money Laundering Act 2018 (SAMLA) and UN Security Council resolutions. Since the end of the Brexit transition period, the UK is no longer bound to the EU sanctions.</p> <p>Although the UK Sanctions List is not part of the OFSI Consolidated List of Financial Sanctions Targets in the UK (BOE List), at least the individual persons, entities, or means of transport subject to financial sanctions will also be included in the BOE List.</p> | For companies with headquarters in the UK, screening against the UKSL list is mandatory. | A              | D601022         |

### 3.1.3 US lists

#### Department of Commerce – Bureau of Industry and Security (BIS)

| List                       | Description  | Relevance   | Price category      | Material number |
|----------------------------|--|---|---------------------|-----------------|
| DPL<br>Denied Persons List | The Denied Persons List contains the names of those who have violated US export regulations and against whom the Bureau of Industry and Security has therefore issued a denial order. The listed persons have been denied all exporting privileges, meaning that no US goods can be provided to or purchased from them. Businesses that violate such a denial order are in violation of US export regulations and risk being listed on the DPL themselves. | Screening against this list is recommended for all companies who trade in US goods directly or indirectly, or are US persons and therefore subject to US law. | Included in license | -               |

| List                                   | Description   | Relevance   | Price category      | Material number |
|--|---|---|---------------------|-----------------|
| <b>EL</b><br>Entity List*              | The Entity List lists persons and entities implicated by American authorities as posing a significant threat in the proliferation of weapons of mass destruction or missile technology.   | Screening against this list is recommended for all companies who trade in US goods directly or indirectly, or are US persons and therefore subject to US law. | Included in license | –               |
| <b>UL</b><br>Unverified List           | The Unverified List has the character of an early-warning list. It contains the names of all persons for which US authorities cannot verify sufficiently and have therefore been flagged as potentially unauthorized to purchase goods of US origin.                                  | Screening against this list is recommended for all companies who trade in US goods directly or indirectly, or are US persons and therefore subject to US law. | Included in license | –               |
| <b>MEUL</b><br>Military End User List* | The Military End User List contains companies that are classified by the US government as military end users. According to the findings of the US authorities, the listed companies pose a significant risk of a military end-use of the goods from Supplement No. 2 to Part 744 EAR. | Screening against this list is recommended for all companies who trade in US goods directly or indirectly, or are US persons and therefore subject to US law. | A                   | D601023         |

\* Like the Military End User List (MEUL) and the Nonproliferation Sanctions (NPS), the Entity List (EL) is generated from the US Consolidated Screening List (USCSL). Occasionally, some time may elapse before listings published in the Federal Register are included in the USCSL and therefore in the EL, MEUL, or NPS in *Compliance Screening*. Please note the instructions of USCSL on the following website: <https://www.export.gov/article?id=Consolidated-Screening-List>.

**Department of the Treasury – Office of Foreign Assets Controls (OFAC)**

| List  | Description   | Relevance  | Price category             | Material number |
|---|---|--|----------------------------|-----------------|
| <p><b>SDN</b><br/>Specially Designated Nationals List</p> | <p>The SDN list contains the names of all persons, groups, and entities worldwide implicated by American authorities as involved in terrorist activities threatening US security.</p> <p>Active SDN sanctions programs*:</p> <ul style="list-style-type: none"> <li>• Balkans-Related Sanctions</li> <li>• Belarus Sanctions</li> <li>• Blocking Property of Certain Persons Associated with the International Criminal Court Sanctions</li> <li>• Burundi Sanctions</li> <li>• Central African Republic Sanctions</li> <li>• Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA)</li> <li>• Counter Narcotics Trafficking Sanctions</li> <li>• Counter Terrorism Sanctions</li> <li>• Cuba Sanctions</li> <li>• Cyber-related Sanctions</li> <li>• Democratic Republic of the Congo-Related Sanctions</li> <li>• Foreign Interference in a United States Election Sanctions</li> <li>• Global Magnitsky Sanctions</li> <li>• Hong Kong-Related Sanctions</li> <li>• Iran Sanctions</li> <li>• Iraq-Related Sanctions</li> <li>• Lebanon-Related Sanctions</li> </ul> | <p>Screening against this list is recommended for all companies who trade in US goods directly or indirectly, or are US persons and therefore subject to US law.</p> | <p>Included in license</p> | <p>–</p>        |

| List  | Description   | Relevance   | Price category      | Material number |
|---|---|---|---------------------|-----------------|
|   | <ul style="list-style-type: none"> <li>• Libya Sanctions</li> <li>• Magnitsky Sanctions</li> <li>• Mali-Related Sanctions</li> <li>• Nicaragua-Related Sanctions</li> <li>• Non-Proliferation Sanctions</li> <li>• North Korea Sanctions</li> <li>• Rough Diamond Trade Controls</li> <li>• Somalia Sanctions</li> <li>• Sudan and Dafur Sanctions</li> <li>• South Sudan-Related Sanctions</li> <li>• Syria Sanctions</li> <li>• Syria-Related Sanctions</li> <li>• Transnational Criminal Organizations</li> <li>• Ukraine-/Russia-Related Sanctions</li> <li>• Venezuela-Related Sanctions</li> <li>• Yemen-Related Sanctions</li> <li>• Zimbabwe Sanctions</li> </ul> |   |                     |                 |
| <b>OFAC-CSL</b><br>Consolidated Sanctions List (OFAC) | <p>With the Consolidated Sanctions List, the OFAC provides a consolidated list of all persons and entities of its non-SDN sanctions programs. The Consolidated Sanctions List is not part of the Specially Designated Nationals and Blocked Persons List (SDN) of the OFAC. Nevertheless, it is possible that individual entries are also included in the SDN list.</p> <p>The OPAF Consolidated Sanctions List includes the following sanctions lists, for example:</p>  | As this is a consolidation of various individual lists, please refer to the individual lists to assess the relevance. | Included in license | –               |

| List | Description  | Relevance | Price category | Material number |
|------|--|-----------|----------------|-----------------|
|      | <ul style="list-style-type: none"> <li>• Foreign Sanctions Evaders (FSE) List</li> <li>• Sectoral Sanctions Identification (SSI) List</li> <li>• Palestinian Legislative Council (NS-PLC) List</li> <li>• Non-SDN Iranian Sanctions Act (NS-ISA) List</li> <li>• List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List)</li> <li>• Non-SDN Menu-Based Sanctions (NS-MBS) List</li> <li>• Non-SDN Communist Chinese Military Companies (NS-CCMS) List</li> </ul> |           |                |                 |

\* For an overview of all sanctions programs and their impact, refer to the OFAC website: <https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-list-sdn-list/pro-gram-tag-definitions-for-ofac-sanctions-lists>

#### Department of State – Directorate of Defence Trade Controls (DDTC)

| List   | Description   | Relevance   | Price category | Material number |
|--|---|---|----------------|-----------------|
| <b>LADP</b><br>List of Administratively Debarred Parties | The persons and entities on this list have been convicted by the US Administration of violations of the Arms Export Control Act (AECA). Listed persons are excluded from trade in US defense equipment including technical data and services. | Screening against the list is recommended for all companies trading in US defense articles. | A              | D601013         |
| <b>LSDP</b><br>List of Statutorily Debarred Parties      | The persons and entities on this list have been convicted by the US Administration of violations of the Arms Export Control Act (AECA). Listed persons are excluded from trade in US defense equipment including technical data and services. | Screening against the list is recommended for all companies trading in US defense articles. | A              | D601014         |

**Department of the Treasury – Financial Crimes Enforcement Network**

| <b>List</b>   | <b>Description</b>  | <b>Relevance</b>  | <b>Price category</b> | <b>Material number</b> |
|---|---|---|-----------------------|------------------------|
| <b>FINCEN</b><br>Money<br>Laundering<br>Concerns List | Special measures for jurisdictions, financial institutions, or international transactions of money laundering concern. List for identifying customers who are using correspondent accounts, including obtaining information comparable to information obtained on domestic customers and prohibiting or imposing conditions on the opening or maintaining of correspondent or payable-through accounts for a foreign banking institution in the US. FINCEN is provided with a range of options that can be adapted to target most effectively specific money-laundering and terrorist-financing concerns. | Screening against this list is relevant for companies that are subject to US law. | A                     | D601012                |

**Department of State – Bureau of International Security and Nonproliferation**

| <b>List</b>   | <b>Description</b>  | <b>Relevance</b>  | <b>Price category</b> | <b>Material number</b> |
|---|---|---|-----------------------|------------------------|
| <b>NPS</b><br>List of<br>Nonproliferati<br>on<br>Sanctions* | The United States imposes sanctions under various legal authorities against foreign individuals, private entities, and governments that engage in proliferation activities. | Screening against this list is relevant for companies that are subject to US law. | A                     | D601016                |

\* Like the Entity List (EL) and the Military End User List (MEUL), the Nonproliferation Sanctions (NPS) is generated from the US Consolidated Screening List (USCSL). Occasionally, some time may elapse before listings published in the Federal Register are included in the USCSL and therefore in the EL, MEUL, or NPS in *Compliance Screening*. Please note the instructions of USCSL on the following website: <https://www.export.gov/article?id=Consolidated-Screening-List>.



**Department of State – Bureau of Counterterrorism and Countering Violent Extremism**

| List   | Description  | Relevance  | Price category | Material number |
|--|--|--|----------------|-----------------|
| <p><b>TEL</b><br/>Terrorist Exclusion List</p> | <p>The Terrorist Exclusion List is based on the USA Patriot Act of 2001. It contains specific terrorist organizations and serves as a basis for decisions for granting entry permissions. A person associated with an organization on the Terrorist Exclusion List can be refused entry into the United States of America.</p> | <p>Screening against this list is at the company's discretion.</p> | <p>A</p>       | <p>D601015</p>  |

**General Services Administration (SAM)**

| List   | Description  | Relevance   | Price category | Material number |
|--|--|---|----------------|-----------------|
| <p><b>SAM</b><br/>System for Award Management Exclusions (formerly GSA Excluded Party List System)</p> | <p>The System for Award Management (SAM) Exclusions contains a list of parties (individuals, companies, entities, or vessels) that are not permitted to receive government contracts or certain types of financial and non-financial assistance and benefits from the US government. A listed individual or legal entity may be excluded by several US authorities at the same time.</p> <p>Due to the large data volume, a software component for automatic updates of the SAM data in the Compliance application must be requested from AEB.</p> <p>The operation at AEB on a dedicated installation may be necessary for high-performance processing, which incurs additional costs.</p> <p>Please contact AEB directly for prices and quotations. Get in contact via the AEB website <a href="https://www.aeb.com">https://www.aeb.com</a> or contact your AEB representative.</p> | <p>Screening against this list is essential for companies participating in the US government's system of awarding government contracts.</p> | <p>B</p>       | <p>D601005</p>  |

### 3.1.4 Japan lists

#### METI – Ministry of Economy, Trade and Industry

| List                        | Description   | Relevance   | Price category | Material number |
|-----------------------------|---|---|----------------|-----------------|
| <b>EUL</b><br>End User List | The End User List issued by Japan's Ministry of Economy, Trade and Industry (METI) – lists the persons implicated in the development or construction of nuclear, chemical, or biological weapons or carrier missiles. | Screening against this list is relevant for companies that are subject to Japanese law. | A              | D601017         |

### 3.1.5 Switzerland lists

#### SECO – State Secretariat for Economic Affairs

| List  | Description   | Relevance  | Price category | Material number |
|---|---|--|----------------|-----------------|
| <b>SECO</b><br>List of the Swiss State Secretariat for Economic Affairs | This list contains persons and entities against which the United Nations, the Organization for Security and Cooperation in Europe, or the authorities of key Swiss trading partners have decided to impose sanctions. | Screening against this list is relevant for companies that are subject to Swiss law. | A              | D601018         |

### 3.1.6 Singapore lists

#### MAS – Monetary Authority of Singapore

| List   | Description  | Relevance  | Price category | Material number |
|--|--|--|----------------|-----------------|
| <b>SG-MAS</b><br>List of the Monetary Authority of Singapore | Persons providing financial services in Singapore are required to be licensed by the Monetary Authority of Singapore (MAS). The Investor Alert List provides a listing of unregulated persons who, based on information received by MAS, may have been wrongly perceived as being licensed or authorized by the MAS. | Screening against the list is not legally required, review at company's discretion | A              | D601019         |

### 3.1.7 Australia lists

#### DFAT – Department of Foreign Affairs and Trade

| List                                       | Description   | Relevance   | Price category | Material number |
|--|---|---|----------------|-----------------|
| <b>AUCL</b><br>Australia Consolidated List | This Australian list consolidates all persons, groups, and entities subject to UN Security Council sanctions or subject to targeted financial sanctions under Australian sanctions law. | Screening against this list is relevant for companies that are subject to Australian law. | A              | D601024         |

### 3.1.8 Further lists

#### United Nations Security Council

| List  | Description  | Relevance   | Price category | Material number |
|---|--|---|----------------|-----------------|
| <b>UN</b><br>Consolidated<br>United<br>Nations<br>Security<br>Council<br>Sanctions List | Consolidated list of all persons, groups, and entities subject to UN Security Council sanctions. The consolidation is to facilitate the implementation of the measures introduced by the UN. The listed persons and entities are subject to various sanctions regimes that provide for different measures. | Screening against this list is at the company's discretion. | A              | D601020         |

#### The World Bank Group

| List                             | Description  | Relevance  | Price category | Material number |
|----------------------------------|--|--|----------------|-----------------|
| <b>WBL</b><br>World Bank<br>List | The World Bank List is issued by the World Bank and lists the firms and individuals classified as fraudulent or corrupt and therefore no longer deserving of subsidies. The listed firms and individuals are excluded from World Bank financing for the defined period. The purpose of this list is to fight fraud and corruption. | Screening against the list is not legally required, review at company's discretion | A              | D601021         |

### 3.2 Lists by Reguvis (former Bundesanzeiger Verlag; subject to license fees)

| List   | Description  | Price category | Material number |
|--|--|----------------|-----------------|
| <p><b>BANZEU</b><br/>European lists</p> <p><b>BANZUS</b><br/>US-American lists</p> <p><b>BANZDIV</b><br/>Various lists</p> | <p>The restricted party lists offered by Reguvis include the relevant EU financial sanctions (source: "Official Journal of the EU") and the publications in the "Bundesanzeiger".</p> <p>They are supplemented by the various lists recommended for consideration by the US Department of Commerce.</p> <p>Furthermore, the Reguvis data content includes the relevant lists from Japan, Australia, Canada, Switzerland, the United Kingdom, and other national and international restricted party lists such as the UN Consolidated Sanctions List</p> <p>The complete (always up-to-date) overview of the lists offered by Reguvis can be found at: <a href="http://www.awr-portal.de/SubBoy/pdf.jsp?site=ReadMe">http://www.awr-portal.de/SubBoy/pdf.jsp?site=ReadMe</a></p> <p>You can purchase a license for these lists directly from Reguvis. Product information and contact details can be found at <a href="https://shop.reguvis.de/data-content/datenservice-haddex-sanktionslisten/">https://shop.reguvis.de/data-content/datenservice-haddex-sanktionslisten/</a></p> <p>In addition to the license from Reguvis, the data service for the automatic provision of the data from Reguvis must be ordered from AEB. Please contact AEB directly for prices and quotations. Get in contact via the AEB website <a href="http://www.aeb.com">http://www.aeb.com</a> or contact your AEB representative.</p> | A              | D601002         |

### 3.3 Dow Jones content (subject to license fees)

| List   | Description   | Price category  | Material number   |
|--|---|---|---|
| <p><b>DJ_*</b><br/>The name of this list depends on the content package licensed with Dow Jones.</p> | <p>Dow Jones provides content on the following topics:</p> <ul style="list-style-type: none"> <li>• Global range of sanctions lists, watchlists, enforcement lists, etc.</li> <li>• Special sanctions package "Sanctions Control &amp; Ownership Feed (SCO)" for screening of the indirect prohibition of provision and the 50% rule of the OFAC</li> <li>• Politically Exposed Persons (PEP) for screening and risk minimization in the areas of money laundering and anti-corruption</li> <li>• "Adverse Media" to check negative media coverage of business partners</li> <li>• "State Owned Companies" to screen and mitigate risk in the area of anti-corruption related to state-owned companies</li> </ul> <p>Dow Jones offers this content in the following sales packages:</p> <ul style="list-style-type: none"> <li>• SCO</li> <li>• Adverse Media</li> <li>• State-Owned Companies</li> <li>• Watchlist (contains SCO, PEP and global sanctions lists)</li> <li>• Trifecta (contains all 4 single packages)</li> </ul> <p>Due to the huge amount of data, it is necessary that you discuss with Dow Jones what content is required exactly. You will license the Dow Jones content directly from Dow Jones. AEB will help you to get in touch with a competent contact at Dow Jones who also knows about the integration with the AEB software.</p> <p>In addition to the license from Dow Jones a software component for automatic updates of the Dow Jones data in the Compliance application must be requested from AEB. Please contact AEB directly for prices and quotations. Get in contact via the AEB website <a href="https://www.aeb.com">https://www.aeb.com</a> or contact your AEB representative.</p> | <p>SCO: B</p> <p>Watchlist (WL): C</p> <p>Trifecta: D</p> | <p>SCO: D601003</p> <p>WL: D601006</p> <p>Trifecta: D601004</p> |

### **3.4 Can AEB provide the German BMWi Frühwarnhinweise via data service?**

The “early warning notifications” by the German Federal Ministry of Economics (BMWi) are not public and will only be made available to the companies by the respective Chamber of Commerce in charge.

Therefore AEB is not allowed by law to distribute this list. The early warning notifications are not a standard offering of AEB's partners either.

If you receive early warning notifications from the Chamber of Commerce and would like to screen against them using the AEB Compliance solution, you can import the addresses as a manual sanctions list in the software.

AEB also offers the import of the early warning notifications as a service, which requires you to provide the list of early warning notifications.

# AEB

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