



Company Policy on the Prevention of Money Laundering

BUHLMANN Group

This policy applies to BUHLMANN Rohr-Fittings-Stahlhandel GmbH + Co. KG and all affiliated companies



1 Purpose and Scope

This policy sets out the principles and procedures designed to ensure that the BUHLMANN Group is not misused for money laundering or terrorist financing. It applies to all employees of BUHLMANN Rohr-Fittings-Stahlhandel GmbH + Co. KG and all affiliated companies in Germany and abroad, in particular to management, sales, purchasing, accounting and all departments with customer or supplier contact, as well as all persons acting on behalf of the BUHLMANN Group.

2 Legal Framework

The BUHLMANN Group complies with the provisions of the German Money Laundering Act (GwG) and all other relevant national and European regulations. Failure to comply with this policy may result in criminal, civil and labour law consequences for the company and the persons responsible.

3 Principles

Zero-tolerance policy: The BUHLMANN Group has a zero-tolerance policy. Money laundering and terrorist financing in any form will not be tolerated.

Know Your Client (KYC): Business relationships are only established with transparent and identified partners.

Risk analysis: Customers and transactions are classified according to their risk in order to deploy resources in a targeted manner.

4 Definitions

Money laundering: The process of introducing illegally obtained assets into the legal financial system.

Terrorist financing: Provision or collection of funds to support terrorist activities.

Suspicious case: Any situation in which there are indications of money laundering or terrorist financing.

5 Risk Assessment

The BUHLMANN Group conducts a risk analysis of its business relationships, evaluating the following criteria:



- Location of the business partner (e.g. high-risk countries according to the FATF list)
- Type of business (cash transactions, complex transactions, unusual payment methods)
- Company structure (offshore companies, opaque shareholdings)

Transactions involving increased risk may only be carried out with the approval of the management.

6 Payment Transactions

The Buhlmann Group conducts its payment transactions in accordance with the following principles:

- Payments are made exclusively via verifiable bank accounts.
- Cash transactions are prohibited.
- Payments to and from third parties outside the contractual relationship are not permitted.

7 Documentation and Storage

All relevant documents relating to identification, risk assessment and transaction documents are retained for at least 5 or 10 years (depending on legal requirements).

8 Suspicious activity Reports

All employees are obliged to report any unusual business transactions immediately. These reports can be made directly to the management or to the Compliance Officer (compliance.BUHLMANN@posteo.de). Examples of unusual business transactions include:

- Unusually high advance payments without business justification
- Payment flows via third countries with no connection to the business
- Unclear ownership structures or lack of cooperation in KYC checks

9 Training and Awareness

All employees who have contact with customers or suppliers receive regular training to enable them to recognise risks and implement the policy appropriately.



10 Review and update

The policy is reviewed at least once a year, as well as on an ad hoc basis, and amended if necessary (e.g. in the event of changes in legislation or new risk scenarios).