



DEUTSCHE NUMIS SANCTIONS AND EMBARGOES

Deutsche Numis is committed to complying with sanctions and embargoes imposed by the United Nations, European Union, and United Kingdom and United States as well as sanctions applicable in the wider group (where relevant) in which it operates. To control this risk, transactions are filtered, client and counterparty data is screened, trade in sanctioned financial instruments is restricted, and further measures such as rejecting or freezing a transaction, restricting client activities, or exiting a client relationship are taken.

The Sanctions Policy – Deutsche Numis sets out the requirements and standards that apply globally within Deutsche Bank. In circumstances where a jurisdiction's requirements are stricter than those set by the Sanctions Policy, they must be applied. However, where a jurisdiction's requirements fall below the standards set by the Sanctions Policy, then Sanctions Policy prevails.

[Russian sanctions and Israel-Hamas war](#)

The Russian invasion of Ukraine led to a significant increase in sanctions against Russian state entities, companies and individuals linked to Russia. Deutsche Numis manages these sanctions with enhanced communications, guidance and operational support led by Deutsche Bank's AFC Sanctions & Embargoes team.

Following the Israel-Hamas war, several regulators imposed further sanctions against individuals and entities with suspected ties to terrorism. AFC manages these new sanctions through standard processes.