

Data Sheet

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# Compliance Screening

Restricted party lists: Against which restricted party lists should a company screen? Which restricted party lists does AEB offer?

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# 1 Change history

Date	Modification	Chapter (please cross-reference)
30.01.2017	Dow Jones content added	3.3
16.05.2017	New lists EURUDU and EURUKM added	3.1.1
06.06.2017	World Compliance deleted	3
17.10.2017	New list TEL added	3.1.2
06.02.2018	New lists for France and the Netherlands added	3.1.1
09.04.2018	Name of French list corrected	3.1.1
29.05.2018	New list for Belgium added	3.1.1
29.05.2018	CAPTA list added for OFAC-CSL	3.1.2
29.05.2018	Columns added to each table for list packages and availability of pricing models.	3
26.06.2018	Information on “FRNL” list updated	3.1.1
03.08.2018	Specially Designated Nationals List (SDN): description updated	3.1.2
13.11.2018	List of the OFAC-CSL list removed: List of Persons Identified as Blocked Solely Pursuant to Executive Order 13599	3.1.2

## 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/embar-gos\\_node.html](http://www.bafa.de/DE/Aussenwirtschaft/Ausfuhrkontrolle/Embargos/embar-gos_node.html)

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

The United States asserts worldwide authority for its foreign trade 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	List package	Available in the pricing model
<b>CFSP</b> 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. The CFSP list contains all the persons, groups, and entities in the lists of names and anti-terrorism regulations at the European level (2580/2001, 881/2002, and 753/2011) and in the embargoes at the national level.	For companies with headquarters in the EU, screening against the CFSP list is mandatory.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

##### Council of the European Union

List	Description	Relevance	List package	Available in the pricing model
<b>EURUDU</b> EU – Russia embargo: 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.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

Which lists does AEB currently offer in the Compliance solution?

List	Description	Relevance	List package	Available in the pricing model
<b>EURUKM</b> EU – Russia embargo: 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.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

**United Kingdom: HM Treasury – The UK government's economic and finance ministry**

List	Description	Relevance	List package	Available in the pricing model
<b>BOE</b> Consolidated List of Financial Sanctions Targets in the UK	Database of all persons, groups, and entities listed in the EU subject to financial sanctions by the UN, EU, and UK. Aside from the financial sanctions issued by UK authorities, this list is the same as the CFSP list.	For companies with headquarters in the UK, screening against the BOE list is mandatory.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>
<b>UKUASL</b> Ukraine Sovereignty List	The Ukraine Sovereignty List, 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. 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 the list is not legally required, review at company's discretion	DATC9	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>



Which lists does AEB currently offer in the Compliance solution?

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

List	Description	Relevance	List package	Available in the pricing model
<b>FRNL</b> French Sanctions List	The French restricted party list consolidates all persons, groups, and entities subject to EU financial sanctions, all individuals and entities subject to sanction measures imposed by the UN Security Council, and all persons and entities subject to sanction measures imposed by the French authorities (Dispositif National de Gel).	Recommended for companies governed by French law.	DATC14	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

**Netherlands – Ministerie van Justitie en Veiligheid**

List	Description	Relevance	List package	Available in the pricing model
<b>NLNST</b> Nationale sanctielijst terrorisme	The Dutch restricted party list (Nationale sanctielijst terrorisme) complements the EU financial sanctions and lists persons and organizations associated with terrorist activities. Under Sanctions Regulation No. DJZ / BR / 1222-07, all assets of the listed persons and organizations are frozen.	Recommended for companies governed by Dutch law.	DATC15	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

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

List	Description	Relevance	List package	Available in the pricing model
<b>BENS</b> 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.	DATC16	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

Which lists does AEB currently offer in the Compliance solution?

3.1.2 US lists

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

List	Description	Relevance	List package	Available in the pricing model
<b>DPL</b> 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.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>
<b>EL</b> 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.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>
<b>UL</b> 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.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

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

List	Description	Relevance	List package	Available in the pricing model
<b>SDN</b> Specially Designated Nationals List	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.	Screening against this list is recommended for all companies who trade in US goods directly or indirectly,	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

Which lists does AEB currently offer in the Compliance solution?

List	Description	Relevance	List package	Available in the pricing model
	<p>Active SDN sanctions programs<sup>1</sup>:</p> <ul style="list-style-type: none"> <li>• Balkans-Related Sanctions</li> <li>• Belarus Sanctions</li> <li>• Burundi Sanctions</li> <li>• Countering America's Adversaries Through Sanctions Act of 2017 (CAATSA)</li> <li>• Central African Republic Sanctions</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>• Global Magnitsky Sanctions</li> <li>• Iran Sanctions</li> <li>• Iraq-Related Sanctions</li> <li>• Lebanon-Related Sanctions</li> <li>• Libya Sanctions</li> <li>• Magnitsky 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>• 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>	<p>or are US persons and therefore subject to US law.</p>		

<sup>1</sup> For an overview of all sanctions programs and their impact, refer to the OFAC website: <https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>

Which lists does AEB currently offer in the Compliance solution?

List	Description	Relevance	List package	Available in the pricing model
<b>OFAC-CSL</b> 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. All new non-SDN sanctions programs will be added to this consolidated list in the future. 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> <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>• The List of Foreign Financial Institutions Subject to Part 561 (the Part 561 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> </ul>	Screening against this list is relevant for companies that are subject to US law.	DATC1 (basis list package) and DATC9	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

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

List	Description	Relevance	List package	Available in the pricing model
<b>LADP</b> List of Administratively Debarred Parties	The list names persons and entities convicted by the US administrative authorities of violating the Arms Export Control Act (AECA) who are prohibited from trading in US defense articles, including technical data and services.	Screening against the list is recommended for all companies trading in US defense articles.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>
<b>LSDP</b> List of Statutorily Debarred Parties	The list names persons and entities convicted by the US administrative authorities of violating the Arms Export Control Act (AECA) who are prohibited from trading in US defense articles, including technical data and services.	Screening against the list is recommended for all companies trading in US defense articles.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

Which lists does AEB currently offer in the Compliance solution?

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

List	Description	Relevance	List package	Available in the pricing model
<b>FINCEN</b> Money Laundering 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.	DATC9	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

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

List	Description	Relevance	List package	Available in the pricing model
<b>NPS</b> List of Nonproliferation 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.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

Which lists does AEB currently offer in the Compliance solution?

Department of State – Bureau of Counterterrorism and Countering Violent Extremism

List	Description	Relevance	List package	Available in the pricing model
<b>TEL</b> Terrorist Exclusion List	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.	Screening against this list is at the company's discretion.	DATC13	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

3.1.3 Japan lists

METI – Ministry of Economy, Trade and Industry

List	Description	Relevance	List package	Available in the pricing model
<b>EUL</b> 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.	DATC1 (basis list package)	<ul style="list-style-type: none"> <li>• Starter</li> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

Which lists does AEB currently offer in the Compliance solution?

### 3.1.4 Switzerland lists

#### SECO – State Secretariat for Economic Affairs

List	Description	Relevance	List package	Available in the pricing model
<b>SECO</b> Liste des Staatssekretariats für Wirtschaft der Schweiz	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.	DATC8	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

### 3.1.5 Singapore lists

#### MAS – Monetary Authority of Singapore

List	Description	Relevance	List package	Available in the pricing model
<b>SG-MAS</b> 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	DATC10	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

Which lists does AEB currently offer in the Compliance solution?

3.1.6 Further lists

United Nations Security Council

List	Description	Relevance	List package	Available in the pricing model
<b>UN</b> Consolidated United Nations Security Council 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.	DATC12	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>

The World Bank Group

List	Description	Relevance	List package	Available in the pricing model
<b>WBL</b> World Bank 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	DATC7	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>



### 3.2 Lists of Bundesanzeiger Verlag (subject to license fees)

List	Description	List package	Available in the pricing model
<b>BANZEU</b> European lists	The complete (always up-to-date) overview of the lists offered by Bundesanzeiger Verlag can be found at: <a href="http://www.awr-portal.de/SubBoy/readme.txt">http://www.awr-portal.de/SubBoy/readme.txt</a> (Remark: scroll down to the end)	DATC2	<ul style="list-style-type: none"> <li>• Basic</li> <li>• Business</li> <li>• Enterprise</li> </ul>
<b>BANZUS</b> US-American lists	AEB customers can license these lists directly with Bundesanzeiger Verlag. Contact details: Mr Melzig (06431 289111, <a href="mailto:melzig@bundesanzeiger.de">melzig@bundesanzeiger.de</a> )		
<b>BANZDIV</b> Various lists	In addition to the license from Bundesanzeiger Verlag the data service for the automatic provision of the data from Bundesanzeiger Verlag must be requested 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.		

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

List	Description	List package	Available in the pricing model
<b>DJ_*</b> The name of this list depends on the content package licensed with Dow Jones.	<p>Dow Jones offers international restricted party lists, but also further data such as the PEP list (politically exposed persons), adverse media, state-owned companies, etc.</p> <p>Therefore, 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.</p> <p>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>	DATC100	<ul style="list-style-type: none"> <li>• Business</li> <li>• Enterprise</li> </ul>

### 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.

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