Anti-Money Laundering Policy

Hielscher Ultrasonics GmbH

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1. Purpose and Scope

Hielscher will not tolerate its products, accounts, or business relationships being used to conceal the origin of criminally obtained funds (money laundering) or to finance terrorism. Hielscher is not an obligated entity under the German Money Laundering Act (Geldwäschegesetz — GwG); this policy nonetheless establishes proportionate safeguards for our commercial transactions, aligned voluntarily with the principles of the GwG and applicable international standards (FATF, EU Anti-Money Laundering directives). It applies to all employees involved in sales, purchasing, finance/accounting, and customer or supplier onboarding.

2. Know Your Business Partner

- Before entering material or ongoing business relationships, identify the contractual counterparty and verify it through commercially available registers or documentation (e.g. commercial register extract, VAT ID validation).
- For higher-risk relationships (unusual structures, high-risk jurisdictions, complex payment chains), establish beneficial ownership to the extent reasonably obtainable.
- Document the business relationship and keep records for at least five years.

3. Transaction Rules

- Payments and receipts are made exclusively by bank transfer to and from the contractual counterparty's account in the counterparty's country of establishment.
- Cash transactions are in principle excluded; any acceptance of cash requires management approval and compliance with legal cash-transaction limits and documentation duties.
- Third-party payments, unusual prepayments, requests to route funds through other accounts or countries, or demands for cash/alternative settlement are red flags and must be escalated to management before execution.
- Anonymous or nominee arrangements are not accepted.

4. Red Flags

Employees must be alert to indicators such as: counterparties reluctant to provide identifying information; prices or terms without economic rationale; invoices inconsistent with the order or delivery; sudden changes of bank details (business email compromise); transactions with or via high-risk jurisdictions; shell-company structures without visible business purpose.

5. Response and Reporting

Suspected money laundering or terrorist financing must be reported internally to management immediately. Management will assess the facts and, where appropriate, report to law-enforcement authorities or the German

Financial Intelligence Unit (FIU) — mirroring the suspicious-activity report under § 43 GwG, which is not a legal duty for Hielscher; tipping off the counterparty is prohibited. Transactions under suspicion may be suspended pending clarification.

6. Training, Sanctions, and Review

Relevant employees receive periodic awareness training. Violations of this policy may lead to disciplinary measures. The policy is reviewed at least annually, including against changes in the EU/German anti-money-laundering framework.

Approved by the Management of Hielscher Ultrasonics GmbH.