

# **Anti-Money Laundering (AML) and Sanctions Policy**

Laszlovvari-Thoma Private Office e.U.  
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## **Our Policy**

### **1. Purpose and Ethical Commitment**

Laszlovvari-Thoma Private Office e.U. is committed not only to delivering high-quality advisory services but also to acting with integrity, transparency and a strong sense of social responsibility.

We firmly believe that the prosperity of clients, the fairness of markets and the stability of communities are not mutually exclusive. Our approach is guided by the conviction that sustainable economic growth must respect both the letter and the spirit of the law.

We recognise that adherence to anti-money laundering and sanctions obligations is an essential pillar of an ethical business environment and a fundamental contribution to limiting systemic risks and economic injustice.

It is our view that modern regulatory frameworks provide sufficient tools to maintain a functioning, fair economic system. As a responsible market participant, we are committed to supporting these objectives with all resources available to us.

### **2. Company Overview**

Laszlovvari-Thoma Private Office e.U. is a sole proprietorship registered in Austria.  
Company Register Number: FN 472855a  
Registered Office: Graz, Austria

Our services include:

- Cross-border financial and insurance consulting
- Mortgage and credit intermediation
- Real estate portfolio advisory via external partners
- Wealth structuring consultancy (without holding or managing client funds)

Clients primarily consist of private individuals and corporate entities from the DACH and CEE regions.

### **3. AML and Sanctions Compliance Commitment**

Although not a regulated financial institution, the business applies proportionate AML and sanctions measures in accordance with:

- Austrian legal requirements (Gewerbeordnung and sectoral regulations)
- EU Anti-Money Laundering Directives
- Relevant international sanctions regimes

## 4. Customer Due Diligence

Identification and verification measures include:

- Personal identification documents
- Proof of address
- Corporate registration documents where applicable
- Ultimate Beneficial Ownership (UBO) declarations
- Politically Exposed Person (PEP) declarations

Identification is performed either in person or electronically, depending on the nature of the engagement and the associated risk profile. Electronic verification may include secure video conferencing, submission of certified digital copies of identification documents, and cross-referencing information through independent public registers. For higher-risk engagements or cases involving significant transaction volumes, only in-person identification and face-to-face verification are accepted without exception.

## 5. PEP and Sanctions Screening

**Politically Exposed Persons (PEPs) can present elevated risks due to their public roles and influence. We recognise the importance of a cautious and transparent approach to such relationships. Accordingly, our policy sets clear criteria and procedures for identifying and assessing PEP-related engagements.**

Screening is conducted through:

- Self-declarations
- Manual checks against EU and UN sanctions lists
- Open-source research (including press archives, corporate registers, and public disclosures)

Policy:

- As a general rule, the business does not engage with Politically Exposed Persons (PEPs), their close family members, or individuals closely associated with them.
- Exceptionally, an engagement may be considered only after the completion of the most stringent enhanced due diligence procedures and under conditions of full transparency and documented justification.
- If any doubt remains regarding the risk classification, the business will decline the engagement.
- All findings and decisions are documented, and the client is informed in writing.

## 6. Record Retention

- Identification records are retained for up to 12 months after engagement closure.
- Records are stored electronically in secure systems.
- Access is limited to participants in the engagement process and external legal counsel if required.
- After the retention period, data is permanently deleted.

## **7. Monitoring and Reporting**

- The business does not hold accounts or process transactions.
- Supporting documentation is shared with partner institutions as per their compliance policies.
- Suspicion of money laundering or terrorist financing is escalated to Austrian authorities without delay.

## **8. Training and Policy Review**

The proprietor is committed to continuous AML education and to updating this policy to reflect changes in legislation and best practices. The policy is reviewed at least annually.

## **Declaration**

This AML and Sanctions Policy has been prepared in good faith to reflect the commitment of Laszlovári-Thoma Private Office e.U. to act with professionalism, transparency and integrity, in line with applicable regulations and the broader responsibility of promoting fair and sustainable economic practices.

Date: 06.07.2025

Csongor Laszlovári-Thoma, MA. MA.  
Owner & Sole Proprietor