BEX

Guide to sanctions lists and business partner screening

White paper



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Why is sanctions screening important?



Why is sanctions screening important?

Does the delivery need to be dispatched immediately because it is overdue? Have you received an urgent high-value order which needs to be processed straight away?

However: Have you checked whether your business partner is on a sanctions list? No? The repercussions of this could be far-reaching, potentially leading to significant challenges for you and your company. Find out more by looking at the cases of these well-known companies.







March 2017: Network equipment supplier and smartphone manufacturer ZTE

ZTE Corporation was accused of supplying US technology to Iran and North Korea. The components in question were American products incorporated into ZTE's network technology. As a result, the company was fined 1.19 billion US dollars and was no longer permitted to receive deliveries from the US. Through further compliance with the rules and monitoring of the probation conditions by an external auditor, the company was not listed on US sanctions lists.

source: www.welt.de; www.justice.gov

May 2017: Aircraft manufacturer Airbus

The financial and trade sanctions imposed on Iran were lifted in July 2015 under the nuclear agreement, with the US under Barack Obama's leadership pursuing a policy of rapprochement. However, Donald Trump prevented further Airbus deliveries to Iran in 2018. The contract is currently on hold. Should the US change course, however, deliveries could resume.

source: www.aerotelegraph.com/iran-schielt-wieder-auf-neue-jets-von-airbus-und-boeing

September 2017: Luxury jeweller Cartier

Between 2010 and 2011, a private individual purchased jewellery from Cartier stores in Nevada and California, instructing the company to ship the goods to Shuen Wai Holding Ltd. in Hong Kong. If Cartier had checked the address beforehand, they would have discovered that Shuen Wai Holding Ltd. had been on the US Export Control Authority's (OFAC) Specially Designated Nationals and Blocked Persons List (SDN List) since 2008. The result was a fine of US\$334,800.

source: www.compliancebuilding.com



What is a sanctions list?



What is a sanctions list?

A **sanctions list** is a list of individuals, organisations or companies against whom economic and/or legal restrictions have been imposed by states or groups of states.

Depending on the interpretation, export lists may also be included, prohibiting the delivery of certain goods to named individuals and/or states.

Sanctions lists are publicly accessible.



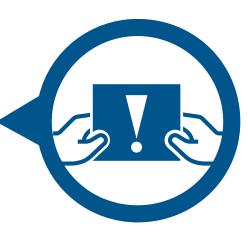


Why are checks against sanctions lists necessary?





Why are checks against sanctions lists necessary?



The screening of individuals suspected of terrorism was introduced in response to the attacks of 11 September 2001.

The following EU regulations form the legal basis for sanctions list screenings:

- (EC) No. 2580/2001 (anti-terrorism)
- (EC) No 553/2007 (Al-Qaeda) amending 881/2002; and (EU) No 753/2011 (Taliban)
- (EU) No. 753/2011 (Taliban)

In addition, there are general EU embargo regulations, as well as country-specific ones. These are listed in the annexes, which name individuals and organisations that are also subject to restrictions. Currently, export restrictions on certain goods apply specifically to entities in Iran, North Korea, South Sudan and Russia.



What consequences could waiving sanctions list checks have for a company?

According to Section 4(2) of the German Foreign Trade and Payments Act (AWG), obligations arising from EU Council Decisions must be implemented. Violations are punishable by up to ten years' imprisonment, substantial fines, or even inclusion on a sanctions list. The financial repercussions of a designation are often daunting for businesses and frequently lead to the initiation of insolvency proceedings. According to Sections 18 and 19 of the AWG, violations of sanctions are punishable by imprisonment of between three months and five years, or a fine of up to €1,000,000 depending on the severity of the offence.

In the interests of general compliance, modern companies should also prioritise the actual objectives of sanctions. These objectives are to combat terrorism, weapons of mass destruction and human rights violations, as well as to control the supply of arms to crisis regions.

The subsequent sections describe how and against which lists checks should be carried out, and the steps to take in the event of a positive match.



Who is required to screen whom against sanctions lists?



Who is required to screen whom?

All companies based in or doing business in the EU are obliged by EU regulations and the AWG to make a reasonable economic and technical effort to check all business partners against the 'Common Foreign & Security Policy' (CFSP) list published by the EU.

This means that companies doing business in Germany, as well as exporting companies, must check all business partners, suppliers, customers and even their employees against the sanctions list.







When must checks be carried out?





When must checks be carried out?



Even if your company only conducts business within Germany, its management is still obliged to check whether its business partners are listed on a sanctions or antiterrorism list.

In the event of a sanctions list hit, the designated entity may not receive any economic resources, services or financial assistance. Failure to comply with these rules may result in fines and imprisonment. The company is primarily liable, as are the managing director and, under certain circumstances, the person responsible for exports.

In addition, there are specific economic risks, particularly in relation to US lists. If, for example, a company or any of its employees maintains business relations with Iran in accordance with German law, they may added to the SDN list. Consequently, American manufacturers may no longer supply the company.



How often must checks be carried out?



How often must checks be carried out?

As a general rule:

There are no official instructions detailing how frequently and in what manner checks must be carried out. However, economically and technically reasonable efforts must be made to prevent the listed person from receiving goods, services or financial support. In the event of a dispute, it will be for a court to decide whether these efforts were sufficient.

For reference:

Most companies perform checks at the following frequency:

- at least once a month for all addresses: address master data
 check
- when creating or changing addresses: online check
- when using addresses for specific purposes (e.g. for a quote):
 document check



Please note: If you cannot find an entry, it is important to be able to demonstrate that the check was carried out. This can be achieved with an audit log.



7

Which sanctions lists must be checked?



Which sanctions lists must be checked?

Below, you will find an overview of all the currently relevant sanctions lists, along with an explanation of when each list must be checked. You can also read about the consequences of a hit on the sanctions lists.



Overview of sanctions lists

Abbreviation	Name
EU CFSP	European Union (EEAS) - Consolidated financial sanctions list
EU RUSD	European Commission — Dual-use goods embargo against Russia
EU RUSK	European Commission — Capital market embargo against Russia
EU IRAN	European Commission — Iran embargo
GB HMT	HM Treasury — Consolidated list of Financial Sanctions Targets in the UK
CH SECO	Swiss SECO - Consolidated sanctions list
JP METI	Japan Ministry of Economy, Trade and Industry — End User List
US SDN	U.S. Treasury — Specially Designated Nationals List
US DPL	U.S. Bureau of Industry and Security — Denied Persons List
US EL	U.S. Bureau of Industry and Security — Entity List
US UL	U.S. Bureau of Industry and Security — Unverified List
US LSDP	U.S. DDTC - List of Statutorily Debarred Parties
US LADP	U.S. DDTC - List of Administratively Debarred Parties
US NPL	U.S. Bureau of Industry and Security - Nonproliferation List
US NONSDN	U.S. Treasury - Consolidated Sanctions List



EU_CFSP (EU sanctions list)

The EU sanctions list, also known as the CFSP, is a consolidated database containing the names of all individuals, companies and organisations which are subject to EU prohibitions on making funds or economic resources available. CFSP is short for 'European Union (EEAS) — Common Foreign and Security Policy'.

Sanctions are implemented in the form of EU regulations that apply to all EU countries. Many of these regulations are based on decisions made by the United Nations Security Council, such as the measures imposed on Russia, North Korea and Syria. Entities listed in the annexes to EU-wide embargo regulations (sanctions against individuals and countries) are consolidated in the CFSP list. This list is recommended for all European companies that want to check for existing supply bans in the EU.



EU_CFSP (EU sanctions list)

The list includes all EU-wide list of designated persons published in the Official Journal of the European Union, in accordance with the relevant regulations. Entries are made for various reasons, such as counter-terrorism measures, the implementation of country embargoes, the prevention of human rights violations, and the imposition of political and economic sanctions.

What if there is a sanctions list hit?

No economic resources or funds can be made available, and financial sanctions will be applied in the form of asset freezing. In exceptional cases, authorisations may be applied for. In Germany, the Federal Office of Economics and Export Control (BAFA) is responsible for approving the supply of economic resources, and the Deutsche Bundesbank is responsible for financial resources.





EU_RUSD (Russia embargo: dual-use goods)

Regulation (EU) No 960/2014 introduced a new prohibition on the sale, supply, transfer or export of goods listed in Annex I to the EC Dual-Use Regulation to the mixed recipients listed in Annex IV to this Regulation (Art. 2a). This also applies to technical assistance or financial services related to dual-use items. Exempt from this prohibition are contracts concluded before 12 September 2014 or where the items are intended for the preservation and security of existing civil nuclear capabilities in the EU or are supplied to non-military end users in the aerospace sector.

What if there is a sanctions list hit?

Activities related to dual-use items are prohibited.





EU_RUSK (Russia embargo: capital market)

According to Regulation (EU) No 833/2014, Article 5, and the revision with Regulation (EU) No 960/2014, the following prohibitions apply:

- no purchase or sale of securities and money market instruments (maturity exceeding 90 days) by September 12, 2014
- no purchase or sale of securities and money market instruments (maturity exceeding 30 days) after September 12, 2014
- provision of new loans or credit (maturity exceeding 30 days) to the entities listed in Annexes III, IV and VI to the Regulation, unless this serves to finance permitted imports and exports between the EU and Russia

What if there is a sanctions list hit?

The prohibitions apply exclusively to financing instruments with a maturity exceeding 30 days. For maturities exceeding 30 days, the above prohibitions apply.





EU_IRAN (Iran embargo)

The EU sanctions against Iran are directed against violations of the nuclear agreement, human rights violations and Russia's military support in the war against Ukraine. This means that the EU measures are more comprehensive than the UN sanctions.

For transactions involving Iran, we strongly recommend checking US lists as well, since the US government's sanctions against Iran have been extended and expanded. We make this recommendation because almost every German company has economic dependencies on the US.

What if there is a sanctions list hit?

No business may be conducted with the designated persons. Suspicious cases must be reported to the BAFA.



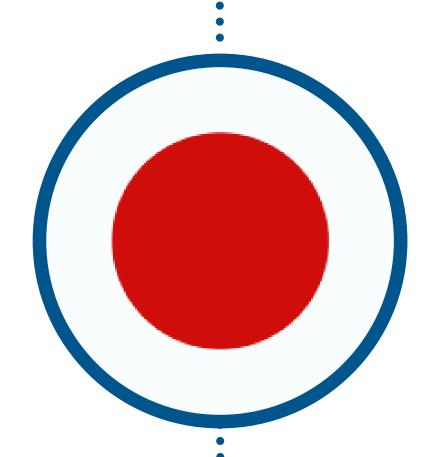


JP_METI (end user list)

The METI list is published by the Japanese Ministry of Economy, Trade and Industry. The list includes companies and organisations suspected of developing weapons of mass destruction or missiles, or of having links to terrorism.

What if there is a sanctions list hit?

Shipments to listed companies or organisations must be approved by METI.





GB_HMT (Consolidated list of Financial Sanctions Targets in the UK)

HM Treasury, the UK's Ministry of Finance, manages the Bank of England's list and publishes it to combat money laundering and prevent terrorist financing. It therefore contains financial sanctions adopted by the EU and national additions by the UK.

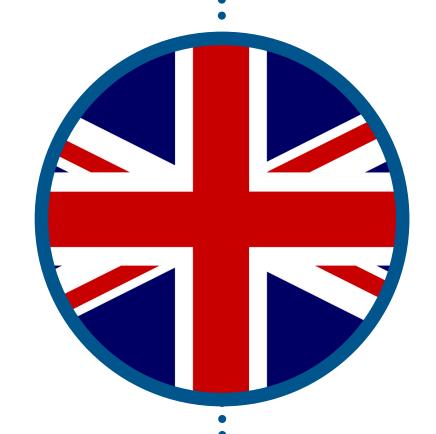
What if there is a sanctions list hit?

Case A: Company headquarters in the United Kingdom:

The sanctions list hit should be reported to HM Treasury. HM Treasury will then decide whether the goods, services or money may be passed on to the recipient.

Case B: Company headquarters in an EU jurisdiction:

As European law is implemented on the sanctions list, no economic resources or finances may initially be transferred, as is the case with the EU list. In the case of national additions which are not on the EU list as well, it may be advisable to consult with HM Treasury.





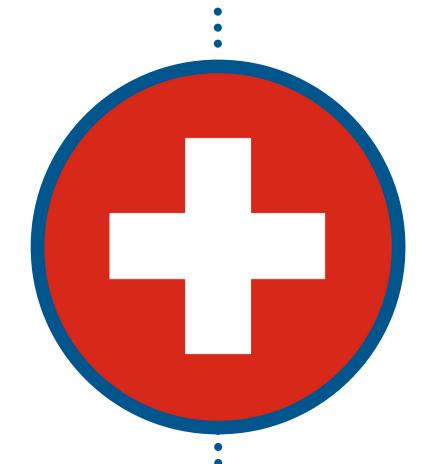
CH_SECO (consolidated list)

The Swiss State Secretariat for Economic Affairs (SECO) is responsible for providing the Swiss sanctions list. This list is used to enforce sanctions imposed by the Organisation for Security and Co-operation in Europe (OSCE) or Switzerland's most important trading partners. The legal basis for this is the Embargo Act (EmbA). Companies subject to Swiss law should check the SECO list.

What if there is a sanctions list hit?

Case A: Company headquarters in Swiss jurisdiction:

Anyone directly or indirectly affected by measures under the Swiss Embargo Act (EmbA) must provide information to the Swiss State Secretariat for Economic Affairs and submit the documents required for a comprehensive assessment or review.



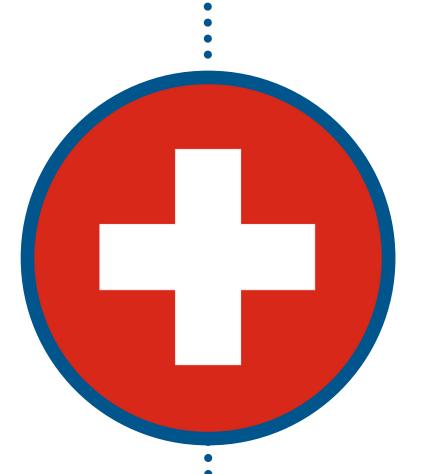


CH_SECO (consolidated list)

What if there is a sanctions list hit?

Case B: Company headquarters in an EU jurisdiction:

As SECO adheres to European sanctions, no economic resources or finances should be transferred in this case either. In the case of national additions which are not on the EU list as well, consultation with the Swiss State Secretariat for Economic Affairs should take place.





US sanctions lists

Which US sanctions lists are of interest to me?

The US authorities provide various address lists that a company should check before initiating business relations. Several programmes have been enacted, which can be found in the OFAC list collection (see below). OFAC (US Office of Foreign Assets Control) is an agency of the US Department of the Treasury.

An important difference to the EU list is that not every match on a US list automatically leads to a ban; sometimes only a licence is required.

In essence, countries outside the US must also observe these lists, as US authorities consider them to be applicable globally — and therefore also legally binding for European companies.

This list includes natural or legal persons involved in activities which threaten the security of the United States.



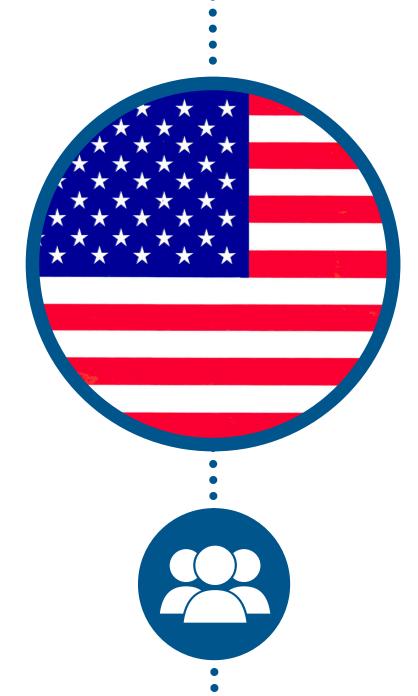


US_SDN (Specially Designated Nationals and Blocked Persons List)

What if there is a sanctions list hit?

If a sanctions list check results in a hit, trading items subject to the Export Administration Regulations (EAR) with the designated business partner requires a licence.

This applies to US persons and, worldwide, to all entries with the following codes: NPWMD, SDGT, SDT, FTO and IRAQ2 or BURMA.



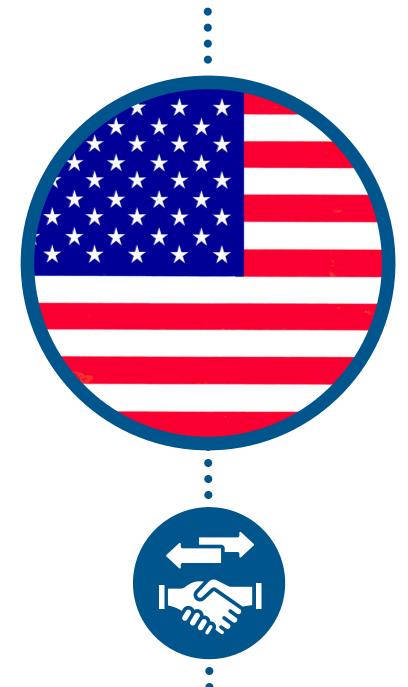


US_DPL (Denied Persons List)

This list contains natural persons and legal entities that have violated US export law. Violations of this list lead to more severe consequences. The Bureau of Industry and Security (BIS) issues denial orders against persons on this list. Those listed are subject to a comprehensive ban on trading in US products.

What if there is a sanctions list hit?

No business may be conducted with designated individuals. A violation may result in your own designation.



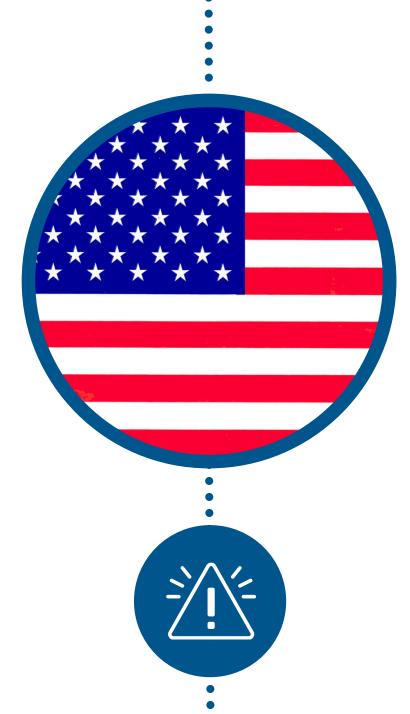


US_EL (Entity List)

This list includes individuals who, from the perspective of the United States, pose a threat to national security or foreign policy interests. They represent a risk or are suspected of being involved in the proliferation of weapons of mass destruction.

What if there is a sanctions list hit?

If a matching list entry is found, certain authorisations are required in order to make US products available to this person.



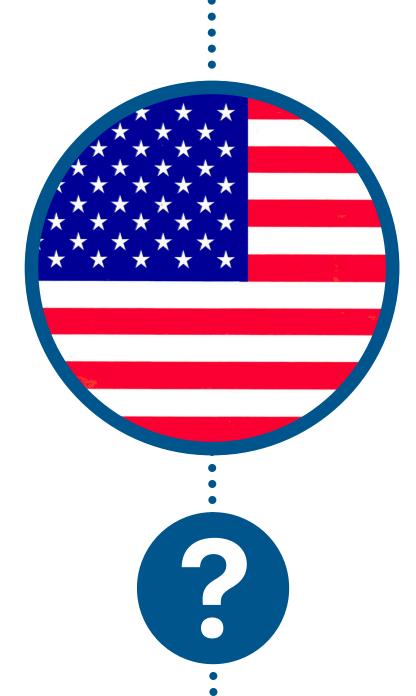


US_UL (Unverified List)

This list acts as an early warning system. It contains companies that US authorities have been unable to adequately investigate, raising doubts about their suitability for handling US products.

What if there is a sanctions list hit?

It must be ensured that the goods are not used for a prohibited end use.



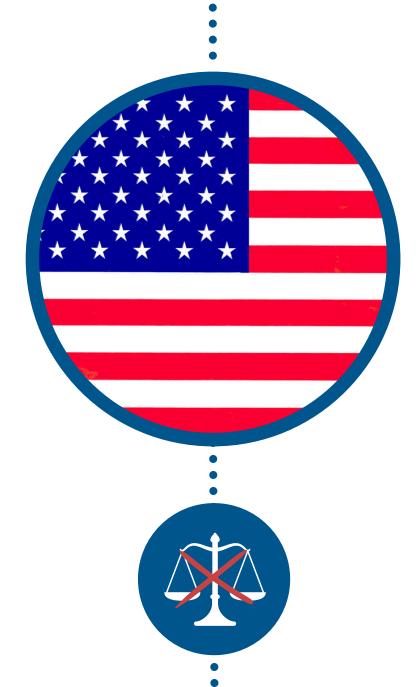


US_LSDP (List of Statutorily Debarred Parties)

This list includes individuals and organisations convicted by a US court for violating the Arms Export Control Act (AECA). Those designated are prohibited from trading in US defence goods, including technical data and services.

What if there is a sanctions list hit?

A hit on this list results in a ban on trading US defence goods, including technical data and services, with the designated individuals.



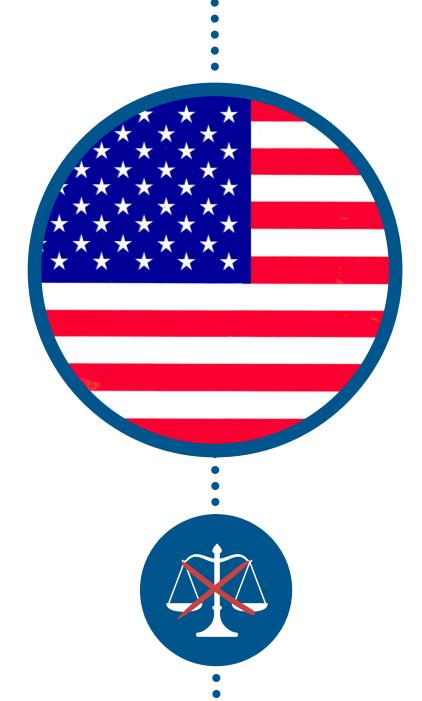


US_LADP (List of Administratively Debarred Parties)

Individuals and organisations listed on the LADP have been convicted by the American administrative authority for violations of the Arms Export Control Act (AECA). Listed individuals are excluded from trading in US defence goods, including technical data and services.

What if there is a sanctions list hit?

A hit on this list results in a ban on trading US defence goods, including technical data and services, with the designated individuals.



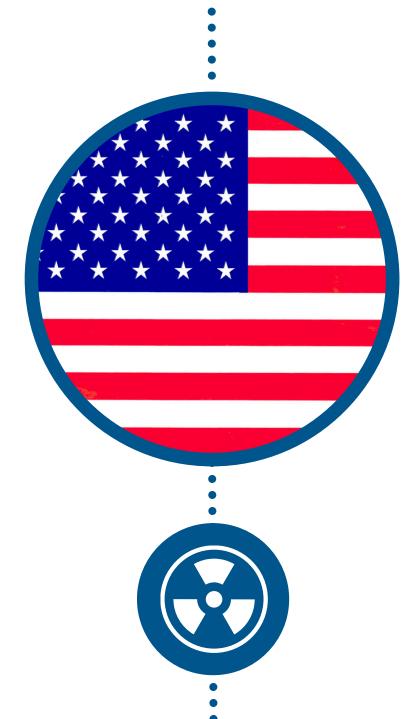


US_NPL (Nonproliferation List)

The Bureau of International Security and Nonproliferation is responsible for enforcing various programmes aimed at preventing the proliferation of materials, technologies and expertise related to nuclear, biological, chemical or radiological weapons of mass destruction, as well as their delivery systems. Non-proliferation is achieved by imposing sanctions on individuals and governments through various programmes.

What if there is a sanctions list hit?

In the event of a hit, the programme under which the person or government is sanctioned must be determined. This can be done using the sanctions list. Depending on the programme, you must check whether the activities in question are covered by the sanctions. If so, authorisation must be sought from the relevant department.



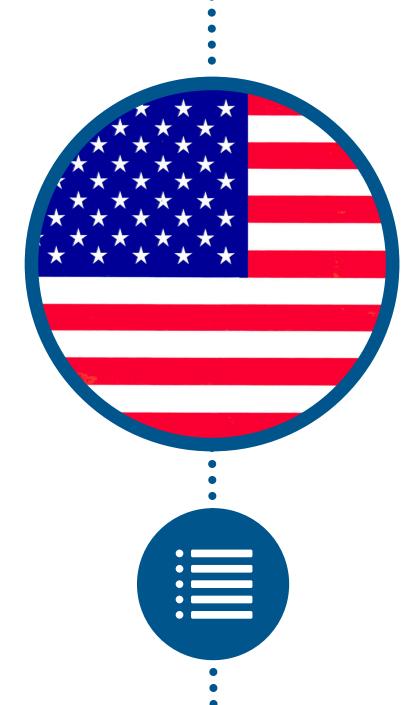


US_NONSDN (Consolidated Sanctions List)

To facilitate compliance with OFAC sanctions regulations, the Office offers all of its non-SDN sanctions lists in a consolidated set of files, the Consolidated Sanctions List. When a new list is created or another is updated, it is added to the consolidated files. The consolidated list includes:

- Foreign Sanctions Evaders (FSE) List
- Sectoral Sanctions Identifications (SSI) List
- Palestinian Legislative Council (NS-PLC) List
- List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List)
- Non-SDN Menu-Based Sanctions List (NS-MBS List)
- Non-SDN Chinese Military-Industrial Complex Companies List (NS-CMIC List)

Although the consolidated files in this list are not part of the SDN List, the records in these consolidated files may also appear in both lists.





US_NONSDN (Consolidated Sanctions List)

What if there is a sanctions list hit?

If a sanctions list check results in a hit, the corresponding list for the entry must be located, and it must be determined whether the activity in question is covered by the sanctions. If so, approval from OFAC is required. As a precautionary measure, a due diligence check should also be carried out if a company on this list is likely to be involved in the export business.





Free online check for the EU sanctions list



Free online check for the EU sanctions list



In Germany, the Ministry of Justice of North Rhine-Westphalia offers a free <u>online service</u> (in German) for checking addresses against EU sanctions lists.

EC Regulation 881/2002 stipulates that the individuals, groups and organisations listed in the annex are subject to certain restrictive measures. The entire consolidated EU list is used as the database for the check.

FiSaLis 2024	
Finanzsanktionsliste: Ermittlung von Personen, Gruppen und Organisationen, für die aufgrund einer Sanktion ein umfassendes Verfügungsverbot besteht.	
△ Suchbegriffe	
Hilfe	
Allgemeines zur Bedienung:	
Bitte einen oder mehrere - durch Leerzeichen getrennte - Namen eingeben (sowie zusätzlich ggf. noch Geburtsdatum/Jahrgang) und danach (Suchen) oder die Eingabetaste betätigen. Die Groß-/Kleinschreibung spielt übrigens keine Rolle, ebensowenig Satzzeichen.	
Die Schaltflächen sind auch via Tastaturkürzel erreichbar (z.B. in Windows mit Internet Explorer oder Chrome: [Alt]+[Taste]): Die entsprechende Taste wird angezeigt, wenn der Mauszeiger kurz über der Schaltfläche verweilt - dann erscheint eine Schnellinfo ("ToolTip"). Beispiel: [Alt]+[S] startet die Suche: Erst die Taste [Alt] gedrückt halten, dann auf [S] tippen.	
Tipp: Mit [Alt]+[H] bzw. 🛕 (Home) kommt man jederzeit zu d	eser Startseite zurück.
Erläuterungen:	
Durch EU-Verordnung 881/2002 wurde angeordnet, dass diejenigen Personen, Gruppen und Organisationen, die im Anhang der Verordnung aufgeführt sind, zur Durchsetzung einer gemeinsamen Außen- und Sicherheitspolitik mit bestimmten spezifischen restriktiven Maßnahmen belegt werden. Zu diesen Maßnahmen gehört vor allem ein umfassendes Verfügungsverbot. Das bedeutet, dass Vermögen, Eigentum und wirtschaftliche Ressourcen dieser Personen, Gruppen und Organisationen eingefroren werden, ihnen Gelder weder direkt noch indirekt zur Verfügung gestellt werden oder zugute kommen dürfen und ihnen keine wirtschaftlichen Ressourcen zur Verfügung gestellt werden dürfen, wodurch sie Gelder, Waren oder Dienstleistungen erwerben könnten. Es ist also z.B. verboten, an sie Geld für Waren, Dienstleistungen, Gehälter, etc. zu zahlen, an sie Immobilien zu verkaufen oder gewerblich zu vermieten oder von ihnen Immobilien zu erwerben.	
	ons-Verordnungen, durch die entsprechende Verfügungsverbote gegen die darin aufgeführten Personen, Gruppen und Organisationen verfolgen diverse Zwecke, u.a. die Durchsetzung von Embargos, die Bekämpfung des Terrorismus etc.
	sonen, Gruppen oder Organisationen schnell und einfach vorgenommen werden. Das Tool durchsucht dabei die umfassende von der EU che sämtliche Sanktions-Verordnungen der EU berücksichtigt. Die Abfrage richtet sich primär an Anwender aus dem justiziellen Bereich.
Anmerkung:	
Ein Treffer in der Finanz-Sanktionsliste ist <i>nicht</i> gleichbedeutend mit einer Personenidentität der gesuchten Person mit der in der Sanktionsliste gefundenen Person. Ein Treffer bedeutet lediglich, dass eine Namensgleichheit oder eine Namensähnlichkeit besteht. Die Ermittlung, ob es sich um dieselbe Person handelt, muss im Wege der Amtsermittlung erfolgen. Hierzu sind in der Finanz-Sanktionsliste die jeweiligen Verordnungen verlinkt und können unmittelbar aufgerufen werden.	
So kann z.B. für weitere Ermittlungen das Geburtsdatum herangezogen werden, auch Aufenthaltsorte zum Zeitpunkt von Taten, derentwegen die Person mit einer Sanktion belegt worden ist. Die genaue Art und Weise der Ermittlungen sowie deren rechtliche Würdigung obliegt selbstverständlich den Gerichten.	

Es wird zudem darauf hingewiesen, dass auch geprüft werden sollte, ob die Sanktionsmaßnahme das vorliegende Rechtsgeschäft umfasst. Technisch bedingt kann nur gegen alle Sanktionslisten

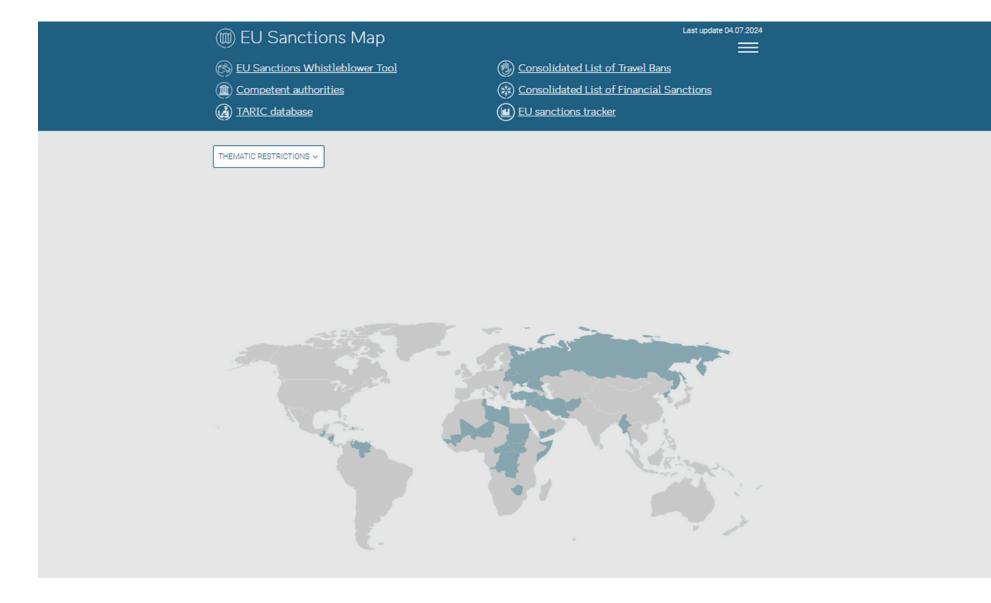
source: www.finanz-sanktionsliste.de/fisalis/

geprüft werden. Dies kann im Einzelfall bedeuten, dass diese z.B. nicht Verfügungen über Vermögenswerte umfassen.



EU Sanctions Map

The **EU Sanctions Map** is an initiative of the Estonian Council Presidency. It provides an overview of sanctions imposed by the Council. The map's greatest advantage is the way it presents the results in a userfriendly way. The graphical representation of countries affected by sanctions, alongside a list of all relevant measures, goods, companies and individuals, makes it easy to maintain an overview. The relevant European Union legal acts are also linked directly.



source: www.sanctionsmap.eu/#/main



Free online check for the US lists



Free online check for the US lists



With <u>Sanctions List Search</u>, the Office of Foreign Asset Control (OFAC) offers a comprehensive check of US sanctions lists. Currently, 74 programmes can be checked for hits.

The threshold for a fuzzy search can be adjusted using a slider. However, the OFAC itself deliberately does not make any recommendations as to which setting should be used.

It should also be noted that this search is only a tool and its use alone does not limit criminal or civil liability.



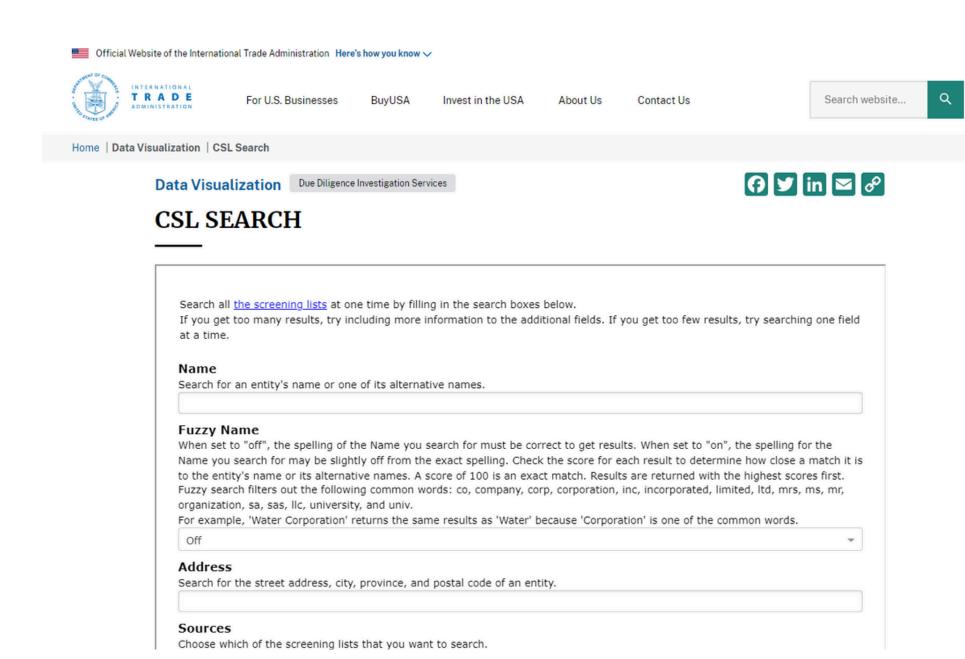
Quelle: https://sanctionssearch.ofac.treas.gov



Consolidated Screening List

As an alternative, the International Trade Administration, U.S. Department of Commerce, along with 19 other US government agencies, provides a **search tool** on a shared website which currently checks against eleven US lists.

A button for fuzzy searching is included here, too. However, when you click on the stored list entries, a large amount of unformatted text appears. We therefore recommend using the OFAC list search and only selecting the fuzzy search as an add-on for security purposes.



source: www.trade.gov/data-visualization/csl-search



Online check for various sanctions lists



10 Online check for various sanctions lists

Sanctions list checks can be carried out online and free of charge on various official export control portals. Costs are only incurred for software that simplifies address and person screening.

Although it sounds simple at first, it is actually quite time-consuming and lacking in transparency in many areas. On top of this, there is the necessary documentation that proves an inspection was carried out in the case of an incident. However, there is a much simpler method.





10 BEX online check

We recommend the BEX online tool for more convenient online checking of sanctions lists. This portal makes it much easier and faster to carry out online sanctions list checks. Key benefits of the portal include:



Compatible with all browsers



ISO 27001 certified



Data not shared



A starter package is available, which includes 50 address checks per year free of charge. For more information about the various subscription packages, which offer different amounts of checks per year, visit the **BEX website** (in German).



Automated sanctions list screening



Automated sanctions list screening

Comprehensive manual checks and documentation are not feasible for a large proportion of companies.

Therefore, it is advisable to automate the necessary checks using software that can screen the entire customer database, for example.

BEX SANSCREEN has been developed to meet this requirement and ensure that sanctions lists are checked without any additional manual effort. Suspicious entities are flagged automatically.



SANSCREEN features:

Automated screening of your business partners against antiterrorism and sanctions lists







- Sanctions list screening to ensure global trade complies with current regulations and restrictions
- Consideration of all relevant sanctions lists
- Sanctions lists checked every three hours by BEX
- Sanctions lists updated daily
- Quick and easy software installation
- Detailed overview of past check results
- If the check result is positive, the lists on which the match is found are shown in detail
- Processes for checking logged without gaps



Options for integration

SANSCREEN can be flexibly integrated into your existing IT landscape, including CRM and ERP systems such as SAP, Navision and APplus. The application is available in both ASP mode (application is operated in the BEX data centre) and IN-HOUSE mode (application is operated in-house).

SANSCREEN can be integrated into the BEX Atlas export product, AES FOR YOU! This allows addresses to be checked automatically and directly during export declaration management. For further information, please visit:

SANSCREEN sanctions list checking software







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