



**Intelligently Defining Aviation®**

**GA TELESIS ANTI-MONEY LAUNDERING POLICY**

**PREPARED BY: ENTERPRISE RISK MANAGEMENT**

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# POLICY STATEMENT & OBJECTIVE

## Policy Statement

GA Telesis (the “Company”) is committed to ensuring full compliance with all applicable laws and regulations regarding anti-money laundering and combating the financing of terrorism (AML-CFT) and has established policies and procedures to control and to limit money laundering and terrorism financing risks. Money laundering or other illegal activities, even if they are inadvertent, can subject the Company to potentially serious civil and/or criminal penalties. Therefore, it is imperative that employees and members of the board of the Company and its affiliates are familiar with and comply with the policies and procedures set forth herein.

## Objective

The objective of this Policy is to ensure that the Company is not used to launder the proceeds of crime, and that everyone is aware of the Company’s AML-CFT policies and procedures and the need to remain vigilant in the fight against money laundering/terrorism financing.

The Company has designated a Money Laundering Reporting Officer (“MLRO”) who is responsible for establishing and conducting employee training programs to ensure that all appropriate employees are aware of the applicable AML-CFT laws and regulations such as the Bank Secrecy Act, USA Patriot Act, and Office of Foreign Assets Controls guidelines, etc., overseeing the Company’s AML-CFT policies and procedures, and acting as a focal point for related inquiries.

## Scope

This Policy is applicable to all of the Company’s domestic and international operations including representative offices, and applies outside the US to the extent that laws and regulations of the host country permit. Where the requirements in the host country or jurisdiction differ from those in the US, the MLRO should be consulted.

# ANTI-MONEY LAUNDERING & COMBATING FINANCING OF TERRORISM (AML-CFT)

## Money Laundering

Money laundering is the criminal practice of processing the proceeds of illegal activities through a transaction or series of transactions so that they appear to be proceeds from legal activities, originated from a legitimate source. Examples include the following:

- ▶ the conversion or transfer of property, knowing that such property is derived from criminal activity or from participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such an activity to evade the legal consequences of that person's action;
- ▶ the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from participation in such an activity;
- ▶ the acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from participation in such an activity;
- ▶ attempting to commit, or aiding, abetting, facilitating or counselling the commission of any of the above-mentioned activities.

## Combating Financing of Terrorism

A terrorist group, like any other criminal organization, builds and maintains an infrastructure to develop sources of funds and channel them to those who provide materials and or services to the terrorist organization. Support for this process, in any form, is illegal.

## Comparison of Money Laundering & Combating Financing of Terrorism

Although money laundering and terrorism financing may share similar attributes, they are different. In money laundering, the focus is on the source of funds, whereas, for terrorism financing, the source of funds is irrelevant, i.e. the funds can be from a legitimate source.

# GA TELESIS PHILOSOPHY

## Our Obligations

### ETHICAL

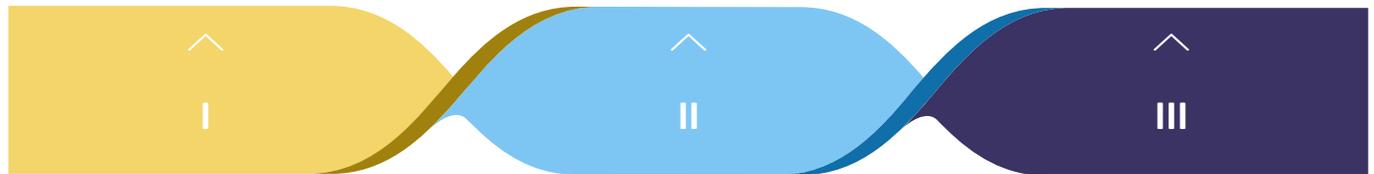
To help preventing crime

### PROFESSIONAL

To ensure that the company is not involved in recycling proceeds of crime

### LEGAL

To comply with laws & regulations



## Avoiding Risks Associated with Non-Compliance

Non-compliance with the legal and regulatory framework increases the risk of fines, penalties and potential criminal liability; it also increases legal, operational, financial, geographic and reputational risks.

### Legal Risk:

If a company is used as a vehicle for illegal activity, it faces the risk of fines, penalties, and criminal liability and could be forced to curtail or discontinue operations.

### Operational risk:

If an AML-CFT policy is faulty or poorly implemented, then operational resources are wasted and there is an increased chance of being used by criminals for illegal purposes. Time and money is then taken from productive activities and spent on legal and investigative actions and the business can be adversely affected.

## **Financial Risk**

If a business does not adequately identify and verify customers, it runs the risk of unwittingly allowing a customer to pose as someone he/she is not. The consequences of this may be far reaching, including inability to recover money that the customer owes.

## **Geographic Risk**

There is increased AML-CFT risk associated with certain international jurisdictions in which the Company and its subsidiaries conduct their businesses. An AML-CFT policy will help to identify and mitigate these risks.

## **Reputational Risk**

The reputation of a business is usually at the core of its success. The ability to attract good employees, customers and funding is dependent on reputation. Even if a business is otherwise doing all the right things, its reputation could be irreparably damaged by participating in illegal transactions.

# GA TELESIS POLICY

Due to the increasing global threat, companies have taken various steps to counter the menace of money laundering and terrorism financing. GA Telesis is focusing on core compliance functions and has adopted a robust policy to remain compliant with AML-CFT regimes in all jurisdictions in which it does business.

## Risk Assessment

In accordance with applicable regulations and as a part of the Company's risk-based approach, all independent business units involved in transactions are required to be assessed on regular basis using different risk factors relating to their customers, geographic areas, products, services, transactions, reputation and delivery channels. These enterprise-wide risk assessments are documented and entered into the Company's records, kept up-to-date and made available to the MLRO and the board.

## Customer Identification and Verification ("Know Your Customer" or "KYC")

The Company has established procedures requiring due diligence on all prospective customers, suppliers, vendors, agents, business partners and other parties (collectively, "Prospective Business Participants") before entering into a business relationship. This due diligence process (referred to as "Know Your Customer" or "KYC") includes the following:

- ▶ Prior to establishing a relationship with a Prospective Business Participant, basic background information should be obtained, including verifying the Prospective Business Participant's identity on the basis of documents, data or information obtained from the Prospective Business Participant and/or from reliable and independent sources. Information obtained includes the Prospective Business Participant's legal name, trading name, nature of business, source of funds, geographical presence, beneficial ownership, management, structure and the expected level of activity, etc.
- ▶ Prior to establishing relationships with prospective representatives or agents, appropriate steps must be taken to confirm their identity and integrity, the due diligence procedures they use and, where necessary, the identity of underlying clients.

- ▶ The customer's profile must be updated periodically based on risk profiling. Customer activity must be monitored against a pre-determined profile on an ongoing basis, paying special attention to higher risk customers or activities and taking prompt action when there is material departure from usual and expected activity.
- ▶ **In addition to conducting our own customized online research**, all new relationships are filtered using Descartes Visual Compliance software, the U.S. Government Consolidated Screening List, and the OFAC Consolidated List.

## Enhanced Diligence

Enhanced due diligence is a process of exercising extra care and diligence for a high-risk customer / transaction, over and above the standard KYC procedures already in place and commensurate with the higher level of risk.

Measures applied in high-risk scenarios include obtaining additional information on:

- ▶ the customer (occupation, assets, address, information available through public databases, internet, etc);
- ▶ the intended nature of the business relationship;
- ▶ the reasons for transactions; and
- ▶ the sources of funds or sources of wealth of the customer.

In addition, the approval of the MLRO must be obtained to commence or continue the transaction or business relationship.

Examples of risk factors that should be taken into account to assess an increased risk of money laundering or terrorism financing and for which an enhanced due diligence is applied, are:

- ▶ Delivery channel (face-to-face or remotely with or without safeguards);
- ▶ Source of wealth (business or family);
- ▶ Transactions outside of a customer's normal course of business;
- ▶ Type and size of expected payments;

- ▶ Nationality or country of residence or registration;
- ▶ Complexity of transactions;
- ▶ Appearance on sanction lists;
- ▶ PEP-status (politically exposed persons) of customers and beneficial owners;

## **Risk Profiling**

To assist in determining the level of AML-CFT due diligence to be exercised with regard to the customer, a compliance risk profile is calculated (Low, Medium, High), and updated at regular intervals as per the above criteria.

## **Embargos and Sanctions Screening**

To ensure compliance with applicable sanctions against persons and entities, we have put in place a list matching system in order to compare the names of customers and prospective customers with official lists from OFAC and other US Authorities, the UN and the European Union.

In addition to the above and in order to provide business units with updated information related to jurisdictions under embargo, the Company's Trade Compliance Department also maintains a Country Watchlist including jurisdictions:

- ▶ Subject to US sanctions
- ▶ Subject to EU sanctions
- ▶ Designated by international bodies (like FATF, UN).

## **Reporting of Suspicious Transactions**

Any unusual or suspicious transactions must be reported to the MLRO, who will investigate and report to management so that appropriate action can be taken.

## **Money Laundering Reporting Officer**

The MLRO is responsible for monitoring the Company's compliance with applicable AML-CFT laws and regulations and internal policies and for establishing and conducting employee training programs to ensure that all appropriate employees are aware of the laws and regulations and the Company's internal policies and procedures.

The Board must ensure that the MLRO

- ▶ Possesses sufficient skills and experience to develop and maintain systems and controls (including documented policies and procedures);
- ▶ Has sufficient resources, including time and support staff;
- ▶ Is given access to all information necessary to perform the AML-CFT compliance function;
- ▶ Performs regular audits of the AML-CFT program;
- ▶ Maintains various logs, as necessary, which should include logs with respect to declined business, politically exposed persons (“PEPs”), and request from regulators and law enforcement agencies, and
- ▶ Responds promptly to requests for information/queries by internal and external stakeholders.

## Record Keeping

Records required to be maintained in connection with this Policy include but are not limited to:

- ▶ Verifying the identity of customer or beneficial ownership; including
  - ✦ Onboarding forms (including KYC) (See Annexures)
  - ✦ Identification of documents
  - ✦ Verification of documents
  - ✦ Business correspondence
  - ✦ Records pertaining to enquiries
  - ✦ Documentation with respect to complex or unusual business patterns
  - ✦ Suspicious activity reporting to law enforcement

## Training

The Company has developed a detailed training program, including follow-up training on a regular basis to ensure and maintain awareness among its staff. All key employees of sales, operations, and finance/ accounting must complete training during the onboarding process and existing employees are trained on a regular basis.

## Overriding Effect

In case of any inconsistency between this Policy and prevailing laws, rules and regulations, the relevant laws, rules and regulations will prevail. Compliance with applicable law is required at all times.

## APPROVAL FROM BOARD OF DIRECTORS

This Policy became effective upon approval by the Board of Directors on July 27, 2020 and copies have been posted on the Company's website and provided to all relevant employees of the Company and its affiliates. All employees and board members will be required to sign an acknowledgment in the form of **Exhibit I** hereto confirming that they have read this Policy and will comply with it.

**Exhibit I****Form of Acknowledgment**

I have read, understand, and agree to comply with the GA Telesis Anti-Money Laundering and Combating Financing of Terrorism (AML-CFT) Policy.

I understand and acknowledge that it is my responsibility to seek guidance and/or clarification on any part of the AML-CFT Policy that is unclear to me.

---

Signature

---

Printed Name

---

Date

## Annexure I

### KYC Form

1. This form must be completed, signed and dated by your Company’s compliance officer or other duly empowered official (as defined in 22 CFR 120.25).
2. Please fill out the form in English and be sure to check all boxes, as appropriate.
3. Incomplete forms will not be accepted, and will result in unnecessary delay.
4. This form is effective for a period of two (2) years commencing on the date of signature below; provided, however, that you must notify us promptly in writing of any changes in the information listed below.
5. For more detailed instructions for completing this form, see Appendix A.

#### A. Background Information

COMPANY INFORMATION			
Legal Name of Company:			
Trading Name of Company:			
Other Company Names:			
Street Address:			
City:	State/Province:	Postal Code:	Country:
Company Website:		Telephone:	

#### B. Type of Entity

FORMATION INFORMATION	
Type of Entity:	
Jurisdiction of formation:	
Is the Company government owned?	Yes:      No:
Is the Company publicly traded?	Yes:      No:
If yes, please identify the market/exchange.	Market/Exchange: _____
Does the Company regularly file information with a governmental agency/department?	Yes:      No:
If yes, please identify the governmental agency/department.	Agency/Department: _____

### C. Ownership/Shareholder Information

This Section is only required if the Company is not publicly traded or government owned. Ownership information must include all individuals and/or entities holding any ownership interest in the Company. This includes individuals or entities that own shares directly or indirectly through another entity. **The sum of ownership percentages in the table below must equal 100%. Attach additional sheets, if necessary, to provide the required information.**

INDIVIDUAL INFORMATION				
First Name	Surname	Date of Birth	Ownership %	Citizenship

LEGAL ENTITY INFORMATION			
Legal Entity Name	Legal Entity Type	Ownership %	Legal Address (no P.O. Boxes)

All individuals with Company ownership must provide evidence of the individual’s legal name and date of birth. The following unexpired government-issued identification or documents may be provided to satisfy this requirement:

- ❖ Passport
- ❖ National Identification Card
- ❖ Any other unexpired government-issued document bearing a photograph

All legal entities with Company ownership must provide evidence of the entity’s legal name, registered number, and registered office address. Certified copies of the following documents may be provided to satisfy this requirement:

- ❖ Articles of Incorporation or Articles of Organization
- ❖ Partnership or Operating Agreement
- ❖ Government-issued Business License
- ❖ Trust Instrument

❖ Certificate of Good Standing

**D. Senior Management Information**

List each Director, Manager, and any Officer (e.g. President, Vice-President, CEO, and CFO) who effectively exercises control over the Company.

SENIOR MANAGERS AND OFFICERS INFORMATION				
First Name	Surname	Date of Birth	Position Held	Citizenship

**E. Trade Compliance representations**

a. Does your Company, or any affiliated individual or entity, appear on any restricted party list maintained by the United States, United Kingdom, and/or the European Union, including the: United States Commerce Department’s Denied Persons, Unverified, and Entity Lists; United States State Department’s Debarred and Sanction Lists; United States Treasury Department’s Specially Designated Nationals List; European Union Consolidated List; European Union Arms Embargoes List, or any other similar entity lists? If yes, please attach a complete explanation.

**Yes**                      **No**

b. Is your Company registered with the United States State Department’s Directorate of Defense Trade Controls?

**Yes**                      **No**

c. Will you be providing GA Telesis with any defense articles (including technical data) that are subject to the United States International Traffic in Arms Regulations (“ITAR”)?

**Yes**                      **No**

d. Will you be incorporating any product obtained from GA Telesis into any defense article that is subject to ITAR?

**Yes**                      **No**

e. With regard to products obtained from GA Telesis, is your Company an:

**End- user**                      **Reseller**

f. For purposes of this section, an “End-user” means a person, company or entity that receives and ultimately uses the exported or re-exported items for its own internal use, and not for distribution

or resale. Forwarding agents or intermediaries like MROs that will eventually ship the parts to a third party are not End-users. A “Reseller” means a company or individual that purchases products with the intention of selling them rather than consuming or using them.

- i. If you are an End-user, please describe how your Company will use products obtained from GA Telesis:
- ii. Please indicate the country or countries to which you will be asking GA Telesis to ship products:
- iii. Will you be re-exporting products obtained from GA Telesis?

Yes: No:

If yes, please indicate to which country or countries:

## F. Banking/Wire Information

Please provide the Company’s banking information. All payments by GA Telesis will be made to the bank account provided below. Requests for amending or replacing the information provided below must be in writing and received by GA Telesis at least ten (10) business days prior to any payment. All such requests will be scrutinized and properly vetted in accordance with the GA Telesis Protocol for Transaction Payments.

BANK ACCOUNT INFORMATION			
Name of Bank:			
Address:			
City:	State:	Zip Code:	Country:
Bank Account Name:			
Bank Account Number:			
ABA Routing Number:		SWIFT Code:	
ACH Routing Number:			
Company’s Finance/Accounting Contact, full name:		Title:	
E-Mail:		Telephone number:	
Bank Contact, full name:		Title:	
E-Mail:		Telephone number:	

## G. Necessary Supporting Documentation

- a) Please provide documentation (e.g., corporate resolution or incumbency certificate) demonstrating that you are authorized to sign this form on behalf of your Company.
- b) Please attach documentation (passport, photo ID, or incumbency certificate) demonstrating that the signature below belongs to the authorized signatory of the Company.
- c) Please provide a W-8 or W-9 form (if applicable).

## H. Declarations and Signature

The undersigned agrees that:

- a. The Company will not ship to any Restricted Country or furnish to any Restricted Person (as such terms as defined below) any product obtained from or provided by GA Telesis in any manner, including through sale, lease, exchange, or part-out.

“Restricted Country” means any country or nation which engages in armed conflict, declared or otherwise, with the armed forces of the United States and/or United Kingdom, and any other country or nation with which nationals (either individual or corporate) of the United States and/or United Kingdom are prohibited from doing business by law, regulation, order, resolution, or stated policy, including but not limited to Cuba, Iran, Syria, Sudan, North Korea, or Crimea. General information on United States sanctions can be found at: <http://www.ustreas.gov/offices/enforcement/ofac/programs/index.shtml>.

“Restricted Person” means (a) any person who is a citizen of, or entity that is organized under the laws of or whose principal place of business is located in, any Restricted Country; and (b) any person or entity with which nationals or residents (either individual or corporate) of the United States and/or United Kingdom are prohibited from doing business by law, regulation, order, resolution, or stated policy. The latest Consolidated Screening List of Restricted Persons can be found at: [http://export.gov/ecr/eg\\_main\\_023148.asp](http://export.gov/ecr/eg_main_023148.asp).

- b. The Company will abide by all applicable United States, European Union, and United Kingdom export control laws and regulations for any products, software or technology purchased from GA Telesis that require any licenses or prior approvals from the United States, European Union, or United Kingdom government prior to export or re- export.
- c. All Trade Compliance representations set forth in this KYC Form shall survive the completion, early termination, cancellation or expiration of any applicable purchase order, agreement or contract with GA Telesis, and the Company will cause its subsidiaries and affiliated companies to comply with these terms.

I hereby declare that I serve as a compliance officer or other duly empowered official of the Company named above, and that the information furnished above is true and correct to the best of my knowledge and belief. I agree to inform you immediately of any changes to such information.

Print Name:

Signature:

Title:

Date:

## APPENDIX A SPECIFIC INSTRUCTIONS

Follow the instructions for each section to expedite processing and to avoid unnecessary requests for additional information.

### **A. Section A. Background Information.**

**Legal Name of Company.** Enter the legal name of the Company exactly as it appears in the corporate charter or other legal document creating the Company.

**Trading Name of Company.** Enter the trade name of the Company if different from the legal name. The trade name is the “doing business as” (DBA) name.

**Other Company Names.** Enter any other name by which the Company is known or under which it does business.

**Address.** Provide the Company’s physical address. If the Company’s physical address is outside the United States, you must enter the city, province or state, postal code, and name of the country. Do not abbreviate the country name.

**Company Website.** Enter the Company’s website. **Telephone.** Enter the Company’s telephone number.

### **B. Section B. Type of Entity.**

**Type of Entity.** Enter the type of entity that best describes the Company. Some examples include: Corporation, Limited Liability Company, Private Limited Company, Public Limited Company, and S.A.

**Jurisdiction of Formation.** Enter the state and/or country where the entity was formed.

**Is the Company Publicly Traded?** Check “Yes” if the Company’s ownership is distributed amongst general public shareholders via the free trade of shares of stock on exchanges or over-the-counter markets. Check “No” if the Company is privately or state-owned. If “Yes” is checked, please enter the market or exchange on which the Company’s shares are traded.

**Does the Company regularly file information with a governmental agency/department?** Check “Yes” if the Company files reports with a governmental agency or department; check “No” if it does not. If “Yes” is checked, please enter the name of the government or agency to which the Company reports.

### **C. Section C. Ownership/Shareholder Information.**

This Section is to be completed only if the Company is not publicly traded. If the Company is not publicly traded, please list the names of all individuals and/or entities having any ownership interest in the Company. For individuals, evidence of the individual’s legal name and date of birth is required. The following unexpired government-issued identification or documents may be provided:

(i) passport, (ii) national identification card, or (iii) any other unexpired government-issued document bearing a photograph. For entities, evidence of the entity's legal name, company or registration number, and registered office address is required. Certified copies of the following documents may be provided to satisfy this request: (i) the Articles of Incorporation or Articles of Organization of the entity; (ii) Partnership Agreement, Operating Agreement, Government-issued Business License, Trust Instrument, or Certificate of Good Standing.

**D. Section D. Senior Management Information.**

Enter the name of each director or manager as well as any officer, including, but not limited to: CEO, CFO, President, Senior Vice President, and other executives who effectively exercise control over the Company.

**E. Section E. Trade Compliance Representations.**

Read each inquiry carefully, check the appropriate box and fill out the applicable requested information.

**F. Section F. Banking/Wire Information.**

Enter the requested Bank Account Information. Payments made to the designated Bank Account must be in accordance with the GA Telesis Protocol for Transaction Payments.

**G. Section G. Necessary Supporting Documentation.**

Please provide clear and legible copies of the requested documents.

**H. Section H. Declarations and Signature.**

Please review each declaration carefully, sign, print your name, and date in the signature section.

## Annexure II

### End User Statement

#### General Instructions:

1. This General End Use Statement (“Statement”) must be completed, signed and dated by the Company’s compliance officer or other Duly Empowered Official (as defined in 22 CFR 120.25).
2. Please fill out the Statement in English and be sure to check all boxes as appropriate.
3. This Statement is effective for a period of one (1) year commencing on the date signed below.

It is the policy of GA Telesis, LLC, its subsidiaries, and affiliates (“GA Telesis”) to verify the end- use and end-user for all products sold, leased, or serviced by GA Telesis, to ensure compliance with applicable export control laws and regulations of the United States (“U.S.”), the European Union (“E.U.”), and the United Kingdom (“U.K.”). As the products you are purchasing and/or leasing, and/or having serviced, may be exported and re-exported and used outside the U.S., E.U., or the U.K., please certify the following:

1. The undersigned, as an authorized officer of the company listed below (the “Company”), certifies on behalf of the Company that it will neither export nor re-export any products, including but not limited to technology or software, nor provide products to GA Telesis for servicing, that have been owned or used by Cuba, Iran, Libya, North Korea, Sudan, Syria, or Crimea (parts installed on an aircraft that flies in and out of Crimea do not constitute an export to Crimea), or to any other sanctioned country, unless otherwise authorized by the government of the U.S., the E.U., or the U.K.
2. The Company will not sell, transfer, use, export or re-export any products for use in activities which involve the development, production, use, or stockpiling of nuclear, chemical, or biological weapons or missiles, or other weapons of mass destruction, nor use products in any facilities which engage in activities relating to such weapons. General information on U.S. sanctions programs can be found at: <http://www.ustreas.gov/offices/enforcement/ofac/programs/index.shtml>.
3. The Company acknowledges that 15 CFR 744.21 specifically prohibits the export, re-export, or transfer (in-country) of any item subject to the EAR listed in supplement no. 2 to part 744, 15 CFR 744.21, and covenants not to sell, transfer, export, or re-export any products purchased from GA Telesis for use in military activities, nor shall it engage in activity proximately or incidentally related to the purchase, sale, repair, or other incorporation of parts as related to military end-users or any military activity, including but not limited to those listed in Supplement No. 4 to Part 744, 15 CFR 744.21.
4. The Company acknowledges that U.S. law prohibits the sale, transfer, export, or re-export or other participation in any transaction involving products with individuals or companies listed on the U.S. Department of Treasury’s Specially Designated Nationals List, U.S. Commerce Department’s Denied Persons List, the U.S. Department of State’s Debarred Parties List, or on any other entity lists published by agencies of the U.S. government. The Company also acknowledges that E.U. and U.K. law prohibits the sale, transfer, export, or re-export or other participation in any transaction involving products with



individuals or companies listed on the E.U. Consolidated List, E.U. Arms Embargoes List, or on any other entity lists published by the E.U. or the U.K. government. The latest Consolidated Screening List may be referenced at: [http://export.gov/ecr/eg\\_main\\_023148.asp](http://export.gov/ecr/eg_main_023148.asp).

- 5. The Company will abide by all applicable U.S., E.U., and U.K. export control laws and regulations for any products purchased or leased from and/or serviced by GA Telesis that require any licenses or prior approvals from the government of the U.S., the E.U., or the U.K., prior to export or re-export of products, software or technology.
- 6. The Company agrees that this End-Use Statement will survive the completion, early termination, cancellation or expiration of any applicable purchase order, agreement or contract with GA Telesis, and the Company will cause its subsidiaries and affiliated companies to comply with the terms hereof.
- 7. The Company agrees that it will immediately notify and provide a revised Statement to GA Telesis should any information provided on this Statement change and/or should the Company become aware of any violation or suspected violation of the terms of this Statement.
- 8. The Company will utilize the products purchased or leased from, or serviced by, GA Telesis for the following end use:

**Commercial**

**Military**

Company Name:

Company Address:

Company Signatory's Name:

Title:

Signature:

Date Signed: