

# AML GLOBAL SANCTIONS COMPLIANCE POLICY

AML Global ("AML") is committed to operating in full compliance with US, UK, EU, and UN sanctions programs and with any additional restrictions required by our supply and banking partners. To achieve this, we have adopted the following procedures:

- 1) AML will screen all counterparties against a database of US (OFAC), UK, EU, and UN sanctions. Counterparties include our suppliers and customers (including aircraft operators and owners, airlines and aircraft registrations). We conduct this screening when we commence a new relationship with any new counterparty and re-screen existing counterparties on a regular basis. All counterparty screenings are logged to provide an audit trail of the due diligence and compliance checks that AML has undertaken.
- 2) Even if a counterparty does not appear on any US (OFAC), UK, EU, and UN sanctions list, AML will not conduct any business transaction with them if (a) they are based in; or (b) they are beneficially-owned (>50%) by nationals of; or (c) their aircraft is registered in any of the countries shown in either Table 1 or Table 2 below. We require, upon request, new or existing counterparties to provide information on their beneficial ownership. We also require new counterparties to undertake not to request fuel or support services in circumstances that would violate AML's Sanctions Compliance Policy.
- 3) AML will not arrange nor facilitate the refuelling of or support services for any aircraft, irrespective of its operation, ownership, or country of registration, if its current location or next or final destination is an airport in any of the countries or regions in Table 1.
- 4) AML will not arrange nor facilitate the supply or use of any aviation fuel believed to have been sourced from any of the countries in Table 1 and Table 2.
- 5) Although these countries are not subject to any blanket embargoes, AML will pay particular attention to any transactions involving countries in Table 3.
- 6) AML will maintain and update additional lists of counterparties and aircraft registrations provided by our supply partners and will not arrange nor facilitate the refuelling of or support services for any counterparties and/or aircraft appearing on those lists.

Table 1

Russian Federation
Crimea or occupied areas of Ukraine
Belarus
Cuba
Iran
Syria
North Korea

Table 2

Myanmar
Sudan
Venezuela

Table 3

Afghanistan	Balkans (Bosnia, Montenegro, North Macedonia, Serbia)
Central African Republic	Democratic Republic of Congo
Ethiopia	Iraq
Lebanon	Libya
Mali	Nicaragua
Somalia	South Sudan
Yemen	Zimbabwe