

COMPLIANCE POLICY – SWAGE AERO B.V.

1. Purpose and Scope

The purpose of this Compliance Policy is to ensure that Swage Aero B.V. conducts its business in an ethical, transparent and legally compliant manner. This policy addresses compliance with European and Dutch sanctions legislation, EU Export Control and Dual-Use Regulation (EU 2021/821), Anti-Money Laundering (AML) requirements, Know Your Customer (KYC) obligations, and internal risk management related to international trade and financial transactions. The policy applies to all employees, management and relevant external partners.

2. Business Activities

Swage Aero B.V. supplies civil aviation maintenance tooling (MRO tools) used for inspection, repair and maintenance of aircraft systems. These products are not classified as military goods, strategic goods or dual-use items and are freely tradable within and outside the European Union. Swage Aero does not engage in activities related to military goods, strategic services or controlled technologies.

3. Customer Due Diligence (KYC)

Swage Aero only conducts business with professional and verifiable customers. Customer acceptance includes verification of company registration (Chamber of Commerce or foreign equivalent), validation of the business address and contact information, and review of the company's industry reputation. Swage Aero does not supply goods to private individuals or non-verified entities.

Customers are screened against applicable EU, UN and OFAC sanctions lists. Deliveries are not made to sanctioned countries or to entities associated with elevated compliance risks.

End-use is assessed to ensure that products will be used exclusively for civil aircraft maintenance. Customers confirm that products are not intended for re-export to restricted regions or for military applications.

4. Supplier and Partner Verification

Suppliers and partners must be registered and reputable companies operating within the aviation, tooling or industrial sectors. Swage Aero verifies that suppliers are not located in sanctioned jurisdictions and are not associated with restricted parties.

5. Export Control and Dual-Use Assessment

Swage Aero assesses all products against the EU Dual-Use Regulation (EU 2021/821) and the Common Military List of the European Union. The tools supplied do not contain controlled technologies, and no export licenses are required.

Where customers are part of a defense organization, Swage Aero confirms that the tools are used solely for standard maintenance operations and not for strategic or military purposes.

6. Anti-Money Laundering and Payment Policy

Swage Aero does not accept cash payments under any circumstances. All financial transactions must be conducted through traceable banking channels.

Incoming and outgoing international payments are reviewed for consistency with the nature of the business, customer profile and country risk assessments. Swage Aero does not process payments on behalf of third parties.

7. Internal Procedures

Swage Aero maintains internal controls to ensure separation of duties between sales, logistics and finance. Unusual or inconsistent transactions are reviewed by management. Annual internal reviews are conducted to verify compliance with export control and sanction regulations. Employees involved in sales, logistics and finance receive periodic training on compliance requirements.

8. Reporting and Escalation

Potential irregularities or unusual transactions are investigated by management. If legally required, Swage Aero reports unusual activities to the appropriate authorities, such as the Financial Intelligence Unit (FIU) or Customs. Transactions that do not meet policy standards are refused.

9. Documentation and Record-Keeping

Customer verification records, transaction information, export assessments and relevant correspondence are maintained in accordance with legal retention requirements. Documentation is stored securely and is accessible for compliance auditing.