

## COMPLIANCE POLICY

**Version:** 1.0

**Issued by:** Swage Aero B.V.

**Scope:** All operations, products, suppliers, and customers

**Effective date:** 01 September 2025

### 1. Purpose

This Compliance Policy defines the principles, controls, and commitments applied by Swage Aero B.V. to ensure that its business activities are conducted lawfully, ethically, and in compliance with applicable regulations within the aerospace supply chain.

Swage Aero B.V. is committed to maintaining high standards of integrity, transparency, and due diligence in all commercial activities, including sourcing, sales, export, and customer engagement.

### 2. Company Position & Scope of Activities

Swage Aero B.V. operates as an independent supplier and reseller of aerospace tooling, equipment, and related products.

The company supplies:

- OEM-manufactured products where explicitly stated; and
- independently manufactured aftermarket products, sourced from qualified third-party manufacturers.

Swage Aero B.V. is not an Original Equipment Manufacturer (OEM) and does not claim OEM authorization, certification, approval, or endorsement unless explicitly agreed in writing.

### 3. Legal & Regulatory Compliance

Swage Aero B.V. complies with all applicable laws and regulations, including but not limited to:

- Dutch and European Union commercial and trade law
- Product safety and product liability regulations
- Export control and sanctions regulations
- Anti-bribery and anti-corruption legislation

Compliance obligations apply across:

- internal operations
- suppliers and subcontractors
- customers and end users

#### **4. Export Control & Sanctions Compliance**

Swage Aero B.V. maintains strict compliance with applicable export control and sanctions regimes, including where applicable:

- EU Dual-Use Regulation (EU) 2021/821
- U.S. Export Administration Regulations (EAR), where applicable
- International Traffic in Arms Regulations (ITAR), where applicable

To ensure compliance, Swage Aero B.V. will:

- screen customers, end users, and destinations against applicable sanctions and denied-party lists;
- request End Use and End Consignee Statements when required;
- refuse, suspend, or terminate transactions where compliance cannot be adequately assured.

#### **5. End Use & End Consignee Responsibility**

Unless otherwise contractually agreed in writing, products supplied by Swage Aero B.V. are intended for:

- civil aviation
- commercial aerospace
- maintenance, repair, overhaul (MRO)
- training and industrial applications

Customers and end users are solely responsible for:

- ensuring lawful and authorized use of supplied products;
- compliance with airworthiness, certification, and regulatory requirements;
- obtaining any required approvals or certifications for use in regulated or certified environments

#### **6. OEM Independence, Aftermarket Products & Intellectual Property**

Swage Aero B.V. respects the intellectual property rights of all Original Equipment Manufacturers (OEMs) and third parties.

Certain products supplied by Swage Aero B.V. are independently manufactured aftermarket products designed to perform in accordance with established industry and OEM technical specifications. In some cases, the original patent protection applicable to such designs has expired, allowing lawful independent manufacture.

Swage Aero B.V. does not represent aftermarket products as OEM-original, OEM-certified, or OEM-approved, and is not affiliated with, endorsed by, or authorized by any OEM, including but not limited to Permaswage®.

Any reference to OEM names, trademarks, or part numbers is made solely for identification, comparison, or cross-reference purposes. All trademarks and trade names remain the property of their respective owners.

#### **6A. No Misrepresentation**

Customers, distributors, and third parties shall not represent any aftermarket products supplied by Swage Aero B.V. as OEM-manufactured, OEM-certified, or OEM-approved products.

Any misrepresentation of this nature is strictly prohibited and shall be the sole responsibility of the party making such representation.

#### **7. Product Authenticity & Counterfeit Prevention**

Swage Aero B.V. maintains controls to prevent counterfeit parts from entering the supply chain, including:

- sourcing from verified and assessed suppliers;
- supplier qualification and performance monitoring;
- traceability documentation where applicable.

Any suspected counterfeit product will be quarantined, investigated, and handled in accordance with applicable legal and regulatory requirements.

#### **8. Supplier Due Diligence & Ethical Sourcing**

Swage Aero B.V. expects its suppliers to:

- operate lawfully and ethically;
- comply with applicable laws and regulations;
- ensure product quality, safety, and traceability.

Supplier performance may be assessed based on delivery reliability, quality, compliance, and risk exposure.

#### **9. Product Safety & Responsibility for Use**

Products supplied by Swage Aero B.V. must be:

- used by competent and trained personnel;
- applied in accordance with applicable instructions, procedures, and safety requirements.

Swage Aero B.V. does not assume responsibility for improper use, unauthorized modification, or application outside the intended scope.

## **10. Record Keeping & Audits**

Swage Aero B.V. maintains appropriate records to demonstrate compliance with this policy and applicable regulations.

Records may include:

- supplier documentation;
- export control records;
- transaction and delivery records.

Audits may be conducted internally or by competent authorities where required by law or contract.

## **11. Reporting & Non-Compliance**

Any suspected violation of this Compliance Policy shall be reported to Swage Aero B.V. management without delay.

Swage Aero B.V. reserves the right to:

- suspend or terminate transactions;
- terminate commercial relationships;
- report violations to competent authorities where required.

## **12. Policy Governance**

This Compliance Policy:

- applies to all employees, contractors, suppliers, and customers of Swage Aero B.V.;
- is reviewed periodically and updated as necessary;
- is made available via the Swage Aero B.V. website or upon request.

### **Issued by:**

Swage Aero B.V.  
The Netherlands