

ANTI-MONEY LAUNDERING POLICY

Amedeo and its affiliates and subsidiaries are firmly committed to participating in international efforts to combat money laundering and the funding of terrorist and criminal activities.

The following are the most important requirements, which serve as minimum standards:

- Appointment of an anti-money laundering officer (MLRO)
- Ascertainment of customer identity
- Establishment and verification of the ultimate beneficiary's identity
- Determination of the status of politically exposed persons
- Record-keeping
- Ongoing monitoring of business relationships
- Reporting of suspicious circumstances/transactions to authorities
- Review of the reliability of employees
- Regular anti-money laundering training for employees

Amedeo has implemented an anti-money laundering program which serves as a minimum standard throughout the Group. It is designed to comply with applicable legislation and guidance relating to the prevention of money laundering, terrorist financing and related financial crimes.

An essential part of Amedeo's anti-money laundering policy is the identification of customers by means of official documents and other relevant sources. Whenever Amedeo is required to identify a customer, the ultimate beneficiary (of the account/the cash transaction) must also be established. If doubts remain as to whether the person to be identified acts on their own account, or in cases where it is obvious the person does not act on their own account, Amedeo will take reasonable and appropriate steps to obtain information about the real identity of the person for whom the customer acts.

In addition, appropriate, risk-orientated processes are in place to determine whether a customer/ultimate beneficiary might be a politically exposed person. Subject to an individual risk assessment, senior management is charged with deciding whether to establish or continue a business relationship with a politically exposed person.

The business relationship with customers is subject to ongoing monitoring so that unusual or suspicious transactions can be detected.

Following customer checks and a review of both the source of funds and the type of transaction, if doubts remain as to whether a transaction conflicts with anti-money laundering legislation, senior management, together with the MLRO shall decide whether to end the business relationship. Suspicious transactions are immediately reported to the authorities. The same procedure applies if a customer refuses to disclose the true identity of the ultimate beneficiary. When reporting to the authorities, the MLRO will include the full context of the unusual or suspicious circumstances.

Regardless of any other legal requirements, records and all other documentation pertaining to business relationships and transactions must be retained for a minimum period of five years. In the case of business relationships, the retention period shall begin at the end of the calendar year in which the business relationship with the contracting party was terminated.

If you have any questions or require additional information regarding Amedeo's anti-money laundering efforts, please contact:

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