



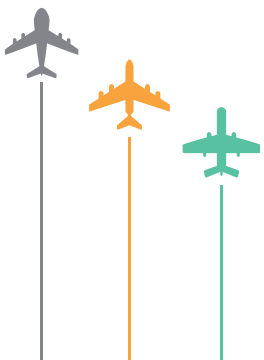
WFS THIRD PARTY SCREENING POLICY & PROCEDURE (2nd Edition)

Edition 2 - 21 March 2023



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1. INTRODUCTION

As a company headquartered in the European Union and under U.S. ownership/control, Worldwide Flight Services Group (hereafter “WFS”) is committed to compliance with anti-bribery & corruption laws and regulations, as well as trade sanctions and export controls implemented by France, the European Union, the United States, the United Kingdom, and the United Nations, and any other laws that may apply to WFS operations in a particular jurisdiction.

Our global reputation and success depend on conducting our international business in accordance with such applicable laws and to the highest moral, ethical and legal standards.

2. OBJECTIVE

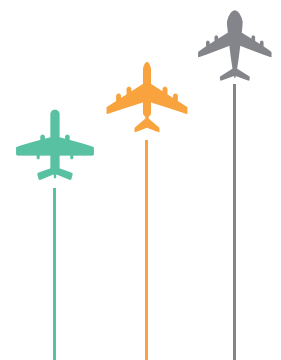
Third Parties (e.g., Customers, Suppliers, Joint Venture partners, Agents, or other counterparties) may pose significant legal, operational and reputational challenges for WFS. It is important therefore that WFS always knows with whom it is doing business and ensures that, when engaging with any Third Party, it does business ethically and in compliance with this Policy and all applicable laws and regulations.

The purpose of this Policy is to:

- Establish minimum governing principles and standards to ensure that WFS complies with:
 - Trade sanctions requirements;
 - Anti-bribery and corruption requirements; and
 - Ethical business practices.
- Provide a formal framework for the WFS Third-Party Due Diligence and decision making process:
 - Define the roles and responsibilities of key stakeholders within the Group; and
 - Evaluate the level of risk presented by each Third Party.
- Mitigate any reputational, operational and legal risk that could arise from a breach of trade sanctions or anti-corruption requirements when dealing with Third Parties.

3. SCOPE

This Policy applies to all WFS legal entities (subsidiaries, branches, representative offices, joint-ventures, partnerships, etc.) and any other entities in which WFS is a shareholder. In instances where WFS owns a minority of an entity’s shares or does not exercise effective control, WFS will use its best efforts to persuade such entity(ies) to adopt this or a materially similar Policy.



This Policy must be complied with by all employees working at all levels and grades for WFS, including Executives, senior managers, directors and employees (whether permanent, fixed-term or temporary) wherever located. WFS also requires that any Third Party working for the group, who is not an employee of WFS (e.g. consultants, contractors or any other Third Party acting on behalf of WFS), complies with this Policy.

4. THIRD PARTIES IN SCOPE

The following types of Third Parties are in scope of this Policy:

- Business Partners - including, but not limited to:
 - Suppliers.
 - Sales Intermediaries.
 - Agents, Advisors, Lobbyists, etc.
- Joint Venture (JV), Consortium or Management Partners.
- Customers. Including, but not limited to:
 - Airlines.
 - Logistics Companies.
 - Airport Authorities.

Definitions and examples of each of these 'Third Parties' are available in Appendix 1 of this document.

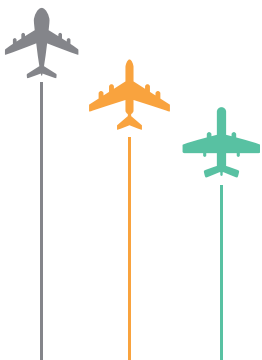
5. DECISION MAKING PROCESS

5.1. Know Your Business Partner / Customer

A determination must be made as to whether a Business Partner or Customer (1) is of good reputation; (2) raises any "red flags" for corruption, sanctions, or illegal or unacceptable business practices; and (3) has the appropriate business qualifications and expertise for the engagement.

All WFS Third Parties in scope of this Policy shall be screened against the main sanctions' lists issued by France, the European Union, the United States, the United Kingdom, and the United Nations, and any other list that may apply to WFS operations in a particular jurisdiction.

WFS only selects Third Parties based on merit, reputation, integrity, and when in line with WFS objectives. WFS will NOT conduct any transaction / business activity or continue an existing Third-Party relationship with individuals or entities that are inconsistent with these values and / or are named on a sanctions list or organized in countries or territories subject to comprehensive sanctions (as defined below, "Restricted Territories").



6. THIRD-PARTY SCREENING AND APPROVAL PROCEDURE

Each time a Business Partner or a prospective Customer is proposed for a contractual engagement with WFS, the risk-based screening and approval procedure described in this Policy shall be followed.

6.1. Identification

The Business Requestor wishing to engage with a Third Party shall in the first instance contact the Group Legal & Compliance Team, or the Local Legal & Compliance Teams ('Compliance') where appropriate.

6.1.1. Third Party does NOT HAVE an EXISTING CONTRACTUAL RELATIONSHIP with WFS:

If the Third Party does not have an existing contractual relationship with WFS, the Business Requestor will need to follow the screening and approval procedure described in this Policy prior to any contractual engagement with the Third Party.

6.1.2. Third Party has an EXISTING CONTRACTUAL RELATIONSHIP with WFS:

If the Third Party has an existing contractual relationship with WFS and has been previously screened and approved in accordance with this Policy, it is important to confirm if the prior screening is still valid, or if it has expired based on the passage of time. See Section 8 below.

- If the previous Due Diligence performed is still valid (as per the validity period in Section 8), Business Requestor may proceed with the Third-Party contractual engagement without the need to conduct any further screening, subject to changes in the law or other internal business procedures (sourcing, commercial).
- If the previous Due Diligence performed has expired, Business Requestor will need to follow the Due Diligence and approval procedure set out in this Policy prior to entering into any contractual engagement with the Third Party.

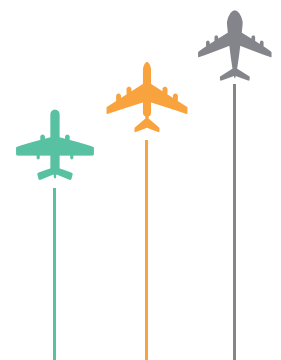
If the Third Party has been previously screened and rejected in accordance with this procedure, the Business Requestor will need to follow the Due Diligence and approval procedure set out in this Policy.

6.2. Completing and submitting due diligence questionnaire.

For any Third Party at issue, the Business Requestor will be responsible for filling in or ensuring that the Third Party fills in the External Due Diligence Questionnaire (available in Appendix 2 of this Policy), and subsequently submitting it by email to the Local Compliance Team (where available) for review, for ultimate submission to Group Legal & Compliance Team.

6.3. Risk Assessment and Screening.

Based on the information provided in the External Due Diligence Questionnaire, the Group Legal & Compliance Team will screen the Third Party against Dow Jones databases (comprehensive list of watchlists and international blacklists) using the Dow Jones KYBP tool, which will automatically perform a risk assessment and scoring on the Third Party, and assign a risk level to it.

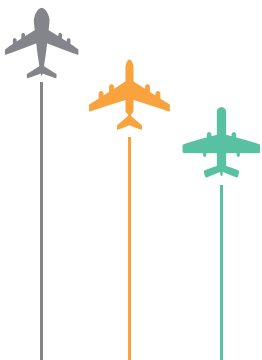


The following levels of risk may be assigned to the Third Party:

Level of risk	Criteria
LOW	<ul style="list-style-type: none"> - Based in a low to medium risk country (Transparency International score of 46 to 100). - Low value transactions (below 100K€/year). - Formal engagement with the third party (written contract). - Low risk sector of activity, no cash payments (for Partners only). - No potential conflict of interest disclosed by WFS business representative. - No connection with public officials. - No adverse media. - No red flags in third party's ownership.
MEDIUM	<ul style="list-style-type: none"> - Based in a low to medium risk country (Transparency International score of 46 to 100). - Based in a country subject to targeted (but not comprehensive) U.S. or EU sanctions (e.g., Ethiopia and Ukraine; see WFS Trade Sanctions Policy and Procedure complete list). - Low to medium value transactions (between 100K€ and 500K€/year). - Formal engagement with the third party, but no contract (purchase order, invoice only). - Low to medium risk sector of activity, no cash payments (Partners only). - No potential conflict of interest disclosed by WFS business representative. - No connection with public officials. - No adverse media.
HIGH	<ul style="list-style-type: none"> - Based in a high-risk country (Transparency International score of 45 and below). - Identified Restricted Territories or third parties restricted under trade sanctions. - Medium or high value transactions (over 500K€/year). - No formal engagement with the third party (No documentation). - High risk sector of activity, cash payments requested (Partners only). - Potential conflict of interest disclosed by WFS business representative. - Connection with public officials. - Adverse media.

6.4. Due Diligence and required approvals

The Group Legal and Compliance Team will verify the information provided in the External Due Diligence Questionnaire and the third-party screening results. According to the Risk Level assigned to the Third Party, they will be categorized as follows:



6.4.1. Low risk Third Parties:

- Low risk Third Parties will be automatically pre-approved by the KYBP tool (No additional actions and/or Due Diligence required).
- An e-mail confirmation/notification of such approval will be sent by the Group Legal & Compliance Team to the Business Requestor.

6.4.2. Medium and high risk Third Parties:

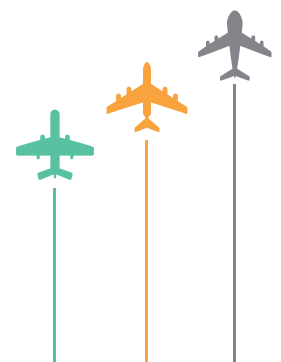
- When deemed necessary, the Group Legal & Compliance Team may conduct additional Due Diligence on the Third Party. This will include, amongst other things, screening of the directors and direct and indirect shareholders.
- Once the verification of available information is completed, the final risk level confirmed, and the potential or existing red flags duly identified, WFS will assess whether the group will engage in a business relationship with the Third Party and whether any approval should be conditioned.
- Conditions may include:
 - Insertion of stricter compliance clauses in the contract (sanctions, ABC, audit rights...).
 - Annual compliance certifications, compliance trainings, etc.
 - Monitoring the performance of the contract.
 - Consultation with the WFS Board.
- An e-mail notification of the final approval or rejection will be sent by the Group Legal & Compliance Team to the Business Requestor. No approval is valid unless and until such an email is sent.

Only after the approval notification is received by the Business Requestor, may contractual engagement with the proposed Third Party proceed in accordance with internal business procedures (sourcing, commercial).

NOTE: All decisions and documents resulting from the Due Diligence Process, including all the appropriate steps and escalations required to mitigate identified risks, shall be documented both by the Business Requestor and the Legal & Compliance Team (both locally and centrally, as appropriate).

7. DILIGENCE VALIDITY PERIODS AND RENEWALS

Approved Customers and Business Partners with an existing contract/business relationship with WFS, must undergo a refreshed Due Diligence every 2 years, subject to changes in the law and the application of WFS' Trade Sanctions Policy. Once expired, the Business Requestor in the Sourcing Team or the Commercial Team will need to renew the Due Diligence and approval procedure on the Third Party.



8. MONITORING AND CONTROLS

8.1. Monitoring

The monitoring of the screening process is essential as WFS must be able to satisfy itself that the Third-Party Due Diligence Process, required by laws, regulations and/or best practices, is in place. Each function is responsible for ensuring that any Third Party it wishes to engage with undergoes screening in accordance with this Policy. The Business Requestor is responsible for ensuring that a diary note is kept specifying the renewal date of each Approval and for renewing the request.

- Senior Management shall ensure that the standards and principles in this and all other related policies, are implemented and followed by all employees involved in the Due Diligence Process.
- Group Legal & Compliance Team shall monitor all Third Parties approved to do business with WFS (supported by the KYBP tool: ongoing screening against Dow Jones Risk Data, monitoring any changes on key risks).
- The Business Requestor (commercial or sourcing) shall monitor the conduct and performance of their Third Parties during the validity of their contracts:
 - Appropriate steps shall be taken to identify risks or red flags not previously anticipated or identified.
 - Any potential concerns identified, must be reported immediately to the Group Legal and Compliance Team.

8.2. Periodic auditing

The functioning of this Policy will be subject to periodic auditing to assess the efficacy of the measures described herein.

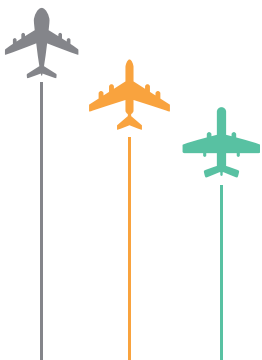
9. DOCUMENT RETENTION

The Third-Party Business Requestor and the Legal and Compliance Team are responsible for maintaining complete, accurate and up-to-date records and supporting documents in connection with the screening of Third Parties under the Policy, for a period of at least five years.

10. REFERENCES

If you have any questions concerning this Policy and Procedure, please contact:

- WFS Group Compliance Officer at: emartinez@wfs.aero
- WFS Group General Counsel and Head of Legal at: cdthomas@wfs.aero



APPENDIX 1: DEFINITIONS

The terms below, whether used in the singular or plural form, shall have the meanings set forth in this section.

• **Advisor:**

An individual or organization providing service and advice. Some advisors may represent an organization in its dealings with another person, business and/or government official.

• **Agent:**

An individual or organization authorized to act for or on behalf of, or to otherwise represent, another organization in furtherance of its business interests. Agents are categorized as:

- Sales agents (those engaged to bring potential contracts and customers);
- Process agents (e.g. visa permit agents).

• **Business Requestor:**

Any individual in WFS organization who wants to initiate, engage or renew a relation with any Third Party (Third-Parties categorization is described in Section 4 of the Policy). These individuals will commonly be part of, but not limited to, the Commercial or Sourcing functions/Teams. The responsibility to correctly and diligently follow the Due Diligence and approval procedure lies in the concrete individual asking to initiate, engage or renew the relation with the Third-Party.

• **Customer:**

The customer is the recipient of a product, service, or idea purchased from an organization. Customers are categorized into two types:

- An ultimate customer, i.e., the end user.
- Intermediate customer or "Sales intermediary", that is to say a customer that purchases goods or services for resale or distribution.

• **Joint Venture (JV), Consortium or Management Partners:**

An individual or organization which has entered into a business agreement with another individual or organization (and possibly other parties) to establish a new business entity and to manage its assets.

• **Lobbyist:**

An individual or organization who takes part in an organized attempt to (legally) influence legislators or official groups.

• **OFAC:**

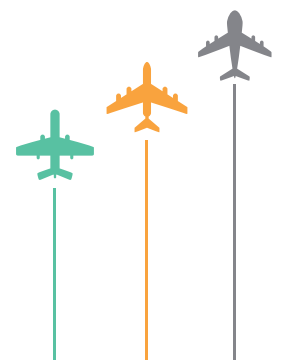
The U.S. Department of the Treasury's Office of Foreign Assets Control.

• **Restricted Territories:**

Countries or territories subject to comprehensive, government-wide, or significant sectoral sanctions published by the United Nations Security Council, the European Union, the French Treasury, OFAC or the U.S. Department of State or other relevant local government authority in the jurisdictions in which WFS operates, including, currently, Cuba, Iran, North Korea, Russia, Syria, Venezuela, the Crimea region, and the non-Ukrainian-government controlled areas of the Donetsk, Kherson, Luhansk, and Zaporizhzhia regions.

• **Supplier:**

An individual or organization that supplies products or services to another organization.



APPENDIX 2: WFS Third Party EXTERNAL DUE DILIGENCE QUESTIONNAIRE

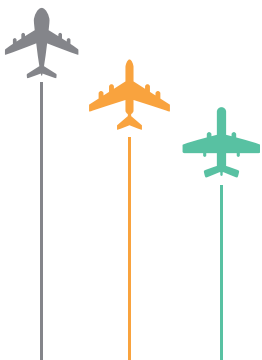
Worldwide Flight Services Group (hereafter “WFS”) is fully committed to complying with all laws and regulations that are applicable in the countries in which the WFS subsidiaries, operational units and affiliates operate.

In compliance with WFS’s Code of Conduct, all information set out in this questionnaire and any other associated document, will be confidential and only used by our employees involved in this Due Diligence process.

Each Third Party, entity or individual will provide accurate answers to this questionnaire no later than **ten business days** after receiving it. Once the document is delivered to WFS, answers will no longer be editable. In case any of these questions is not adapted to our business situation, please provide the most appropriate answer.

In circumstances where false information or misleading information is provided, WFS reserves the right not to enter into a business relationship with the Third Party.

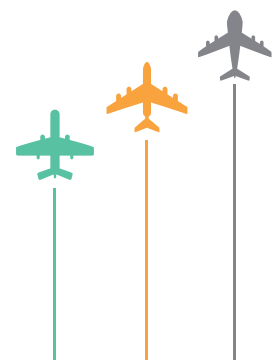
GENERAL INFORMATION AND ACTIVITY OF THE THIRD PARTY	
Third Party / Company legal name:	
Legal status:	
Date of creation:	
Registered Address:	
Registered Country:	
Place and date of incorporation: <i>Provide a copy of the certificate of incorporation and commercial register. For French companies, please provide in appendix a copy of the Kbis extract (less than three months).</i>	
Stock Exchange listed:	(YES/NO)
If YES, which:	
What type of product or services does your company offer/perform?	
Sales revenues (last two years): <i>Please provide the Company's latest audited financial statements or Tax Filing.</i>	
Confirm the list of country(ies) where the product or services are to be provided:	
Do you perform any direct/indirect activity in any of the Major Sanctioned Countries (MSC's): North Korea, Cuba, Crimea / Sevastopol / Donetsk / Kherson / Luhansk / Zaporizhzhia, Iran, Russia, Syria and Venezuela.	(YES/NO)
If YES, indicate which, and the % of your revenues / purchases / investments related to such country(ies):	
Do you perform any direct/indirect activity with any persons listed on any sanctions- or export-related restricted party list administered by the U.S., EU, UN, or another relevant governmental authority (e.g., the Specially Designated Nationals and Blocked Persons List)?	(YES/NO)
If YES, indicate which, and the % of your revenues / purchases / investments related to such parties:	
How the agreement will be documented? (Contract, purchase order, no documents, etc.).	



THIRD PARTY BANK ACCOUNT	
Name of third party's chosen bank	
Bank address	
Account holder name	
Account number	
How payments will be made, including any expense reimbursement, bonuses, or other payments?	

RELATIONSHIPS WITH PUBLIC OFFICIALS	
Are you a public third party:	(YES/NO)
If YES, indicate the % shares of your organization held by a public official or entity:	
Any Politically exposed person (PEP*) involved in your organization: shareholder, ultimate beneficial owner, director, or manager?	(YES/NO)
If YES, please indicate full name and function:	
*According to the Financial Action Task Force (FATF), a PEP is an individual who is or has been entrusted with a prominent public function.	

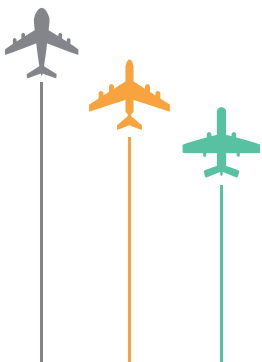
DIRECTORS / MANAGERS			
Function	Full Name	Nationality / Residence	Date of birth
President			
Chief Executive Officer			
Chief Financial Officer			
General Counsel			
Chief Operations Officer			
Purchasing Officer			
Commercial Officer			
...			



DIRECT SHAREHOLDERS (INDIVIDUALS OR ENTITIES OWNING DIRECTLY MORE THAN 5% OF THE SHARES)			
Full Name	Country of incorporation (if entity)	Nationality / Residence (if individual)	% of shares

INDIRECT SHAREHOLDERS / ULTIMATE BENEFICIAL OWNERS (INDIVIDUALS OR ENTITIES WITH MORE THAN 25% OF SHARES OR MORE, OR CONTROLLING INDIRECT SHAREHOLDERS UP TO THE ULTIMATE BENEFICIAL OWNER)			
Full Name	Country of incorporation (if entity)	Nationality / Residence (if individual)	% of shares up to ultimate beneficial owner

REPUTATION OF THE THIRD PARTY	
Former or current sentences / fines due to non-compliance with laws and regulations of your organization or related entities:	(YES/NO)
If YES, please provide a short description of each one.	



ETHICS AND COMPLIANCE	
Do you have a Compliance Program and general compliance policies?	(YES/NO)
Do you have a Code of Conduct or any other similar document? <i>If YES, please attach a copy.</i>	(YES/NO)
Do you have specific Economic and Trade Sanctions policies or procedures? <i>If YES, please attach a copy.</i>	(YES/NO)
Do you have specific Anti-corruption and bribery policies or procedures? <i>If YES, please attach a copy.</i>	(YES/NO)
Do you have specific Anti-trust policies or procedures? <i>If YES, please attach a copy.</i>	(YES/NO)
Do you have specific policies, procedures or charts regarding the respect of people (prohibition of discrimination, harassment, equality, diversity, human rights etc.) <i>If YES, please attach a copy.</i>	(YES/NO)
Do you have a whistleblowing and a non-retaliation policy? <i>If YES, please attach a copy.</i>	(YES/NO)
Do you perform employee trainings on these different matters? <i>If YES, provide its main principles, target population and frequency.</i>	(YES/NO)
Are there any additional concerns or red flags in relation to this potential commercial engagement that WFS should be aware of? <i>If YES, please provide more details.</i>	(YES/NO)

CONFLICT OF INTERESTS DISCLOSURE	
To the best of your knowledge, does any conflict of interest exist (professional or private relationship) between your Company, shareholder(s), ultimate beneficial owner(s), managing director(s), officer(s), or any other employee(s); and:	
1) Any WFS Company, director, officer or employee? <i>If YES, please describe</i>	(YES/NO)
2) Any actual or potential customer of WFS? <i>If YES, please describe</i>	(YES/NO)

By submitting this Questionnaire, the representative of the Third-Party warrants that the information provided here-in is accurate and complete at the date of submission.

Date: _____ Location: _____

Full Name: _____ Signature: _____

Job Function: _____

