

COMPLIANCE AWARENESS TRAINING



ASG Risk Management Department
2023

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RISK MANAGEMENT DEPARTMENT



COMPLIANCE IN ASG

KEY COMPONENTS OF OUR CORPORATE COMPLIANCE PROGRAM:



AVAILABLE POLICIES, PROCEDURES, AND TRAINING PROGRAMS

- ANTI-MONEY LAUNDERING;
- ANTI-CORRUPTION & ANTI-BRIBERY;
- ANTI-FRAUD;
- WHISTLEBLOWING;
- CONFLICT OF INTERESTS;
- COUNTERPARTY ONBOARDING & DUE DILIGENCE.



ANTI-MONEY LAUNDERING (AML), COUNTERPARTY ONBOARDING & DUE DILIGENCE (Codd)

ANTI-MONEY LAUNDERING

We take a zero-tolerance approach to money laundering and terrorist financing.

We are committed to the highest level of transparency, integrity, and accountability.

We aim to conduct business only with reputable counterparties whose funds originate from legitimate sources.

COUNTERPARTY ONBOARDING AND DUE DILIGENCE

We have established formal procedures for Counterparty Onboarding and Due Diligence in addition to stringent guidelines to ensure compliance with sanctions and fair competition regulations.

We maintain and enforce sanctions compliance rules to meet all obligations under the sanction regimes of the jurisdictions we operate;

We comply with sanctions adopted by the European Union (EU), United Nations (UN), Office of Foreign Assets Control (OFAC), Bureau of Industry and Security (BIS), Canadian authorities, and other relevant sanctioning entities.

FRAUD, CORRUPTION, OR BRIBERY?



The company takes a zero-tolerance approach to fraud, bribery, and corruption and is committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

INTRODUCTION TO FRAUD & CORRUPTION

WHAT IS FRAUD?

Fraud is when someone intentionally deceives or misleads another person or organization for personal gain or to cause harm. It often involves lying, cheating, or stealing to obtain money, property, or personal information.

WHAT IS CORRUPTION?

Corruption is a dishonest behavior where a person uses their power or authority for personal gain or to benefit someone else.

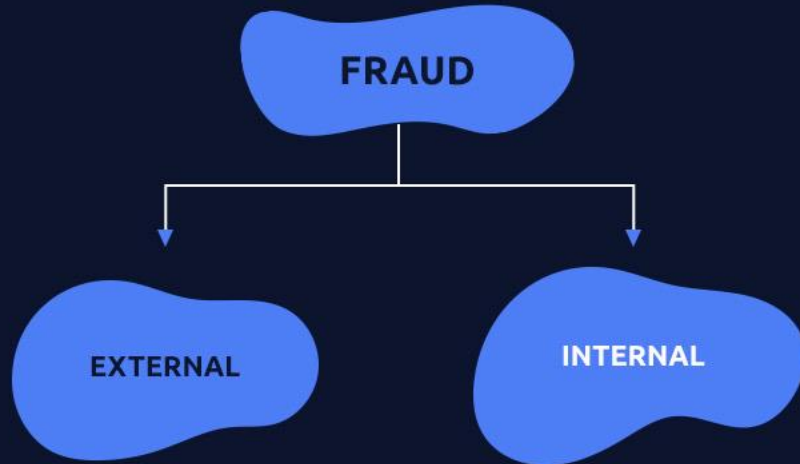
WHAT IS BRIBERY?

Bribery is the act of giving or receiving something valuable in exchange for an unfair advantage or preferential treatment. It involves offering or accepting money, gifts, or other incentives to influence a person's actions or decisions.



RISK OF FRAUD

CLASSIFICATION OF WORKPLACE FRAUD

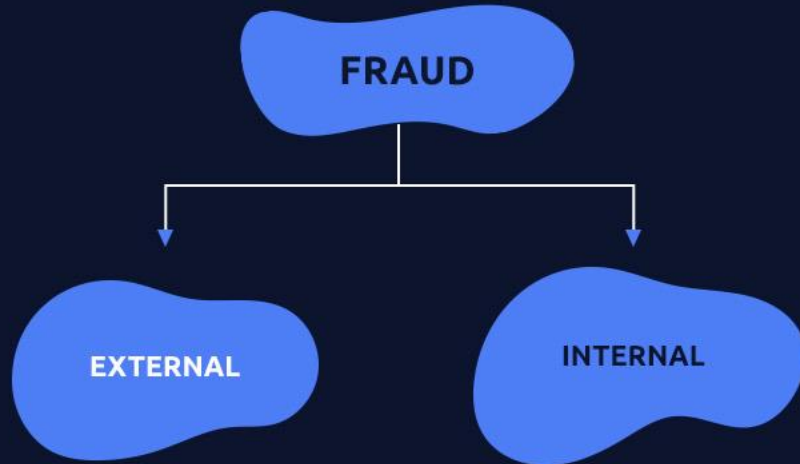


INTERNAL FRAUD

- Abuse of assigned position or responsibilities;
- Misappropriation of the company's assets and funds;
- Manipulation of information system applications and data for personal advantage;
- Destruction, disposition, or removal of records or any other assets with an ulterior motive to manipulate and misrepresent the facts;
- Alteration of any document or account records belonging to the company or its clients;
- Theft;
- Willful suppression of facts/deception in matters of appointment, placements, and submission of reports;
- Utilizing the company funds for personal purposes.

RISK OF FRAUD

CLASSIFICATION OF WORKPLACE FRAUD



EXTERNAL FRAUD :

- Phishing emails, designed to mimic legitimate sources like banks or government agencies, and request sensitive information or money;
- A vendor who submits false invoices for payment or overcharges for goods or services;
- A perpetrator who impersonates a company's employee or executive with the intent to unlawfully obtain access to confidential information or financial resources;

RISK OF CORRUPTION AND BRIBERY

GREY AREAS OF CORRUPTION AND BRIBERY:

- GIFTS, ENTERTAINMENT, AND HOSPITALITY;
- CHARITABLE AND POLITICAL CONTRIBUTIONS, SPONSORSHIP;
- FACILITATION PAYMENTS AND KICKBACKS;
- CONFLICTS OF INTEREST, NEPOTISM.

FACILITATION PAYMENTS

These are typically small, unofficial payments that usually are made to public officials with purpose to secure or expedite a routine or necessary action.

KICKBACKS

These are typically payments made in return for a business favour or advantage.

NEPOTISM

This is a type of conflict of interest and means favoring the related employees by taking advantage of the employee's position of power.

SOME THINGS TO KEEP IN MIND

- Employees can give gifts openly and on behalf of the company, however, it's strictly prohibited to offer gifts with the anticipation of receiving any form of business advantage;
- Donations or sponsorship can be given when the activity provides an opportunity for community engagement or fostering relationships without business gain;
- It is strictly forbidden to make or to accept facilitation payments or kickbacks of any kind;
- Employees are encouraged to avoid conflicts of interest and carry out their duties with utmost integrity, prioritizing the best interests of the company.

CONSEQUENCES OF FRAUD AND CORRUPTION



COMPANY

Fraud and corruption can cause significant damage to the company's reputation and financial standing.



EMPLOYEES

The losses and costs incurred by fraudulent behavior can mean fewer pay rises, increase redundancies, and decrease employee benefit.



INDIVIDUALS

- For any individual who is a victim of fraud this could mean emotional distress or financial loss.
- For individuals or entity who commits fraud or corruption, the consequences could mean disciplinary procedures, dismissal and/or prosecution.



GOOD CORPORATE CITIZENS

EMPLOYEES ARE THE FIRST LINE OF DEFENCE
AGAINST FRAUD AND CORRUPTION:

REGARDLESS OF THE POSITION AND RESPONSIBILITIES, ALL EMPLOYEES:

- Are guardians of the company's assets and fund;
- Are responsible for safeguarding the company resources and ensuring that those resources are utilized only for authorized purposes;
- Should conduct themselves with selflessness, integrity, accountability, and honesty;
- When fraud or corruption is suspected, the case must be immediately reported.



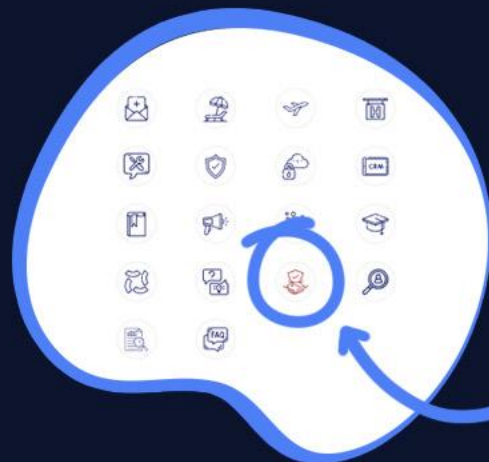
REPORTING FRAUD & CORRUPTION

ALL EMPLOYEES AND COUNTERPARTIES OF THE ORGANIZATION, HAVE AN IMPORTANT ROLE TO PLAY IN SAFEGUARDING THE ORGANIZATION FROM ANY UNETHICAL PRACTICES.



THERE ARE THREE WAYS YOU CAN REPORT A CONCERN:

- By sending an email to COMPLIANCE@AVIASG.COM. In this case we expect you to fill the form attached to the Whistleblowing policy or submit a free form notice containing necessary information;
- By filling an online application known as "Trust-Line" via company's website or employees can do it via [Intranet page](#) of the company.
- By contacting ASG Head of Risk Management Department.



GUARANTEES TO WHISTLEBLOWER

WE HAVE A ZERO-TOLERANCE POLICY FOR ANY FORM OF RETALIATION OR DISCRIMINATION AGAINST WHISTLEBLOWERS.

The company will take the necessary measures to prohibit any form of retaliation against whistleblowers, including threats of retaliation and attempts of retaliation.

The responsible team and unit handling the concern will ensure that the identity of the whistleblower is protected from the moment of the receipt of the incident.



USEFUL INFORMATION

**TO FAMILIARIZE YOURSELF WITH OUR WHISTLEBLOWING POLICY
AND ANTI-CORRUPTION & ANTI-BRIBERY POLICY, PLEASE VISIT
OUR COMPLIANCE WEBPAGE.**

Please feel free to reach out to Avia Solutions Group Risk Management
Department by email at risks@aviasg.com

THANK YOU



Avia Solutions Group (ASG) PLC
Risk Management Department
2023