



## Aperion AML Compliance Policy Statement

### Anti-Money Laundering

Aperion Energy Group, LLC (the “Company”) is committed to the fight against money laundering and leading the way in Responsible Project Finance.

Money laundering is the process by which the illegal origin of wealth is disguised to avoid the suspicion of law enforcement authorities. Money laundering undermines confidence in the international financial system. The challenges in the fight against money laundering are vast, and potential threats exist in every corner of the world. Financial services firms, regulators and law enforcement agencies alike work very hard to stay ahead of increasingly sophisticated criminals that seek to exploit the global financial system.

As a company that operates in a wide variety of cultures, languages and legal systems Aperion recognizes that it may become a target of would-be money launderers.

#### **Aperion's Mission and Approach**

Aperion's mission is to serve as a trusted partner to our clients by responsibly providing financing, engineering, construction and operations services that enable the reliable delivery and sustainment of critical energy and infrastructure. Consistent with this goal, Aperion is committed to the fight against money laundering and leading the way in Responsible Project Finance – conduct that is transparent, prudent and dependable.

The following key principles govern Aperion's approach to controlling Anti-Money Laundering (AML) risk:

- Compliance with AML laws and regulations;
- Cooperation with and support of regulators and law enforcement agencies in their efforts to prevent, detect and control financial crime;
- Serving customers and providing products and services consistent with Aperion's AML risk appetite and commitment to responsible finance and the highest ethical standards, and
- Adherence to the requirements of Aperion's Global AML Program.

Aperion recognizes its obligation to cooperate with and support regulators and law enforcement agencies in their efforts to prevent, detect and control financial crime, and to comply with AML laws and regulation to close off the financial channels that money launderers and terrorist organizations use for illicit purposes. We have also worked to ensure that we have proper policies, processes and controls in place to deter money laundering and other financial crimes against the Company, our clients and stakeholders.

## Aperion's Global AML Program

Aperion has established a comprehensive Global AML Program to help protect both our clients and our franchise from the risks of money laundering, terrorist financing and other financial crimes. The foundation of this global program is Aperion's Global Anti-Money Laundering Policy, which provides a globally consistent system of controls to identify and mitigate AML risks and comply with AML laws and regulations. These include:

- **Compliance Officer:** The CFO, an individual with extensive Public and Private company governance experience in global environments, has been established as the official in charge of compliance with AML laws and regulations;
- **Governance and Enterprise-wide controls:** This control framework governs the overall program, including Global AML policies, processes, training and testing.

## AML Control Lifecycle

Built on and guided by this foundation are the key Program elements that are executed throughout three phases of the AML Control Lifecycle: Prevention, Detection and Reporting:

- **Prevention:** Building and adhering to a Know Your Customer (KYC) program that focuses on the creation and administration of globally consistent standards/policies, customer risk scoring, onboarding and maintenance of customer data housed in an enterprise-wide repository.
- **Detection:** Global transaction monitoring to identify unusual or suspicious transactions or patterns of activity, as well as robust Global AML Investigations to provide holistic reviews of both new and existing clients across various businesses and regions.
- **Reporting:** Active creation, tracking and filing of Suspicious Activity Reports (SARs), Suspicious Transaction Reports (STRs) and Currency Transaction Reports (CTRs), as required in many countries.

## AML Program Execution

Aperion's risk management framework – including the AML Program – is based on three lines of defense:

- **First Line of Defense (Business Management)** - Each of Aperion's Businesses, including in-Business risk personnel, owns and manages the risks, including compliance risks, inherent in or arising from the Business, and is responsible for having controls in place to mitigate key risks, performing manager assessments of internal controls, and promoting a culture of compliance and control.
- **Second Line of Defense (Independent Control Functions)** - Aperion's independent control functions, including Compliance, Finance, Legal and Risk, set standards according to which Aperion and its businesses are expected to manage and oversee risks, including compliance with applicable laws, regulatory requirements, policies, procedures, and standards of ethical conduct. In addition, the independent control functions provide advice and training to Aperion's Businesses and establish tools, methodologies, processes and oversight of controls used by the



Businesses to foster a culture of compliance and control and to satisfy those standards. AML Advisory and Coverage AML Compliance Officers (AMLCOs), support their respective Business by providing regulatory compliance expertise and guidance in an advisory capacity to Business Management. They are responsible for coordinating, monitoring and, where appropriate, overseeing day-to-day compliance with the Global AML Program.

- Third Line of Defense (Internal Audit) - Aperion's Internal Audit function independently reviews activities of the first two lines of defense based on a risk-based audit plan and methodology approved by the Aperion Board of Directors.

## **Our Continued Vigilance**

Aperion is fully committed to remaining vigilant to prevent the use of our products and services by those who seek to abuse them. We continually seek to combat money laundering and terrorist financing through the prevention, detection and reporting of unusual or suspicious behavior. We actively work to prevent terrorist organizations from accessing our financial services, readily assist regulators and law enforcement agencies in their efforts, and promptly respond to inquiries.

We also continually evaluate the strength of our existing policies, procedures and technologies, and update them, as necessary, to address the changing environment. We also train our staff to assure that they are well versed in the evolving techniques that criminals use to infiltrate the system and are well-equipped to combat money laundering and other financial crimes.

The fight against money laundering is a constant and evolving process. At Aperion, we recognize that preventing money laundering and identifying possible terrorist financing activities involves constant diligence and the ability to keep pace with the sophisticated schemes employed by criminals. We acknowledge that we must constantly work to identify and understand the potential risks of money laundering and terrorist financing, and implement appropriate processes to mitigate, and ultimately alleviate, such risks.

Sincerely,

Aaron Wheeler

CEO

Last Update / Review: July 2022