



(954) 793-8771



[sales@tru-serv.com](mailto:sales@tru-serv.com)

[www.tru-serv.com](http://www.tru-serv.com)



613 Coolidge Ave, NE  
Lake Placid, FL, 33852

## **TruServ Aviation Compliance Policy: Screening Business Counterparties**

### **I. Introduction**

TruServ Aviation is committed to maintaining the highest standards of integrity, ethical conduct, and legal compliance. This document outlines our policy on screening business counterparties to mitigate potential risks associated with financial crimes, fraud, and sanctions issues.

### **II. Due Diligence Process**

**KYC (Know Your Customer):** TruServ Aviation will collect and verify comprehensive information about the identity, ownership, and management of potential business counterparties.

**Sanctions Screening:** All potential counterparties will undergo rigorous screening against government-issued sanctions lists to ensure compliance with international trade regulations.

**AML (Anti-Money Laundering) Checks:** TruServ Aviation will conduct assessments to identify and evaluate the risk of potential money laundering activities associated with business counterparties.

**Financial Background Checks:** Evaluation of the financial stability and history of potential counterparties to detect any signs of fraudulent or suspicious activities.

**Third-Party Risk Assessment:** TruServ Aviation will perform a comprehensive risk assessment of potential business counterparties, considering factors such as reputation, past legal issues, and industry compliance.

### **III. Continuous Monitoring**

TruServ Aviation recognizes the dynamic nature of business relationships. Therefore, ongoing monitoring of existing counterparties will be conducted to identify and address any emerging risks promptly.

### **IV. Utilization of Third-Party Services**

TruServ Aviation may engage specialized third-party services or utilize advanced screening software to enhance the effectiveness of our screening processes. These services will be selected based on their reliability, compliance with legal standards, and industry best practices.



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## **V. Compliance with Laws and Regulations**

Our screening processes adhere to all applicable local, national, and international laws and regulations governing the aviation industry. TruServ Aviation is committed to staying updated on relevant legal requirements to ensure the effectiveness and compliance of our screening procedures.

## **VI. Reporting and Documentation**

Any identified issues or concerns during the screening process will be documented, reported, and appropriately addressed by the designated compliance team.

## **VII. Training and Awareness**

TruServ Aviation will provide regular training programs to employees involved in the screening process to ensure a thorough understanding of our compliance policy and the importance of effective due diligence.

## **VIII. Conclusion**

This Compliance Policy reflects TruServ Aviation's dedication to mitigating risks associated with financial crimes, fraud, and sanctions issues in our business relationships. All employees are expected to comply with this policy to uphold the company's commitment to integrity and ethical conduct.

*This policy may be subject to periodic review and updates. The latest version will be made available to all employees.*