



EXPORT AND TRADE COMPLIANCE POLICY (Global)

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1 Document Control Information

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2 Introduction

This Policy establishes global principles, minimum requirements, and governance to ensure compliance with applicable export, re-export, import, sanctions, and trade control laws in all jurisdictions where the Company operates, and to ensure that products distributed or placed on the market meet applicable product safety, environmental, chemical, and market-access requirements. This integrated policy is designed to protect customers, partners, regulators, and the Company by ensuring lawful, ethical, and responsible trade and distribution activities.

3 Scope

This Policy applies globally to:

- The Company and all its subsidiaries and affiliates
- Directors, officers, employees, contractors, agents, temporary staff, and other representatives
- Business partners where compliance obligations are contractually imposed (e.g., resellers, distributors, logistics providers)

It covers all hardware, software, licences, accessories, bundled solutions, and services (including intangible transfers such as software downloads, licence keys, updates/patches, technical assistance, and access to controlled technology).

4 Key definitions (summary)

- **Export:** Any shipment, transfer, transmission, or disclosure (oral, written, electronic, visual) of goods, software, technology, or services across borders; may include “deemed exports” (release of controlled technology to a foreign national where applicable).
- **Re-export:** Shipment or transmission of an item subject to an export regime from one foreign country to another, including release of controlled technology/software to a national of another country where applicable.
- **Dual-use items:** Goods, software, and technology with both civilian and potential military applications (including many encryption, telecom, and information security products). Such goods include, but are not limited to, the schedule of items listed in the Wassenaar Agreement
- **Sanctions/Restricted parties:** Individuals, entities, vessels, aircraft, or other parties subject to restrictions under applicable sanctions programmes and/or laws that the Company is required to follow
- **Product compliance:** Including but not limited to the conformity of products with applicable product safety, environmental, waste management, packaging, batteries, conflict minerals, chemical, and market-access rules in jurisdictions where products are placed on the market.

5 Policy principles

- The Company conducts all business in strict compliance with applicable export, re-export, import, trade control, customs, human rights controls and sanctions laws, and applicable product compliance laws.
- Where multiple jurisdictions apply to a transaction (e.g., local export controls plus U.S. re-export controls), the Company will comply with all applicable requirements.
- No transaction may proceed where it is prohibited, where required information is missing, or where required authorizations (licenses, exemptions, approvals) have not been obtained and documented.
- Compliance is a shared responsibility: employees must follow this Policy and supporting procedures, escalate doubts and red flags promptly, and complete required training.

6 Trade compliance requirements

6.1 6.1 Export controls and re-export controls

Employees must comply with applicable export control laws governing the export, re-export, transfer, or provision of goods, software, technology, or services. This includes U.S. export controls and the export control regimes of other applicable jurisdictions as well as special circumstances such as freezones. The Company maintains procedures to assess export control requirements based on destination, end user, and end use.

6.2 6.2 Sanctions and embargoes

Sanctions and embargo programmes are dynamic and vary by jurisdiction and programme scope. The Company does not maintain a static list of “embargoed countries” within this Policy. Instead, employees must rely on authoritative regulator sources and Company screening systems and internal restricted-territory guidance maintained by Trade Compliance. Transactions must be screened for destination, end user, and other parties against applicable sanctions/restricted party/ embargo lists and/or sources and must not proceed if prohibited.

6.3 6.3 Screening and transaction controls

All applicable parties to a transaction (e.g., sold-to, ship-to, end user, consignee, freight forwarder, banks where relevant) must be screened against restricted party lists and other applicable lists. Transactions must also be screened for embargoed/restricted destinations and for diversion risk indicators. Screening is performed using Company systems (e.g., SAP GTS and third-party list content providers where configured) and may require manual review (e.g. requesting documentation on end uses) where a potential match or risk indicator is flagged.

6.4 6.4 Licensing and authorizations

Where a licence, authorisation, or government approval is required (including under export controls, sanctions, or national import/export rules), the transaction must not proceed until the required authorisation is obtained, licence conditions are understood, and the licence details are recorded in the Company’s systems and retained in accordance with recordkeeping requirements. Licence exceptions or general licences (where applicable) may be used only when all conditions are satisfied and documented. Any special licensing conditions such as those that pertain to sector-based restrictions and/or freezones must be adhered to in order to ensure the Company does not overstep the boundaries of the licence.

6.5 6.5 Import, customs, origin, and documentation

All import and customs declarations, classification (HS/HTS or equivalent), valuation, origin determinations, Incoterms and required markings must be accurate and complete. False or misleading statements in export/import documentation are prohibited. Documentation must include any required

destination control statements and must be retained according to the Company's record retention policy and any applicable legal retention requirements.

6.6 Recordkeeping, audits, and monitoring

Trade compliance records (including, but not limited to screening results, classifications, licences, end-use/end-user/partner documentation, shipment documentation, and approvals) must be maintained in secure systems and retained per the Company's record retention policy and any jurisdictional legal requirements. Internal controls are subject to periodic monitoring, internal audits, and external audits as required.

6.7 Reporting and non-retaliation

Any actual or suspected violation of export controls, sanctions, customs rules, or this Policy must be reported immediately through management, Trade Compliance, Legal, or the Company's reporting hotline. Retaliation against individuals who raise concerns in good faith is prohibited.

7 Product compliance requirements (market access)

Products distributed or placed on the market must comply with applicable product safety, environmental, chemical, energy, labelling, and market-access legislation in the jurisdictions where products are made available. Product compliance obligations apply in parallel and no single directive or regulation supersedes the others. Applicability depends on product functionality, composition, distribution model and/or the location of import and export.

7.1 EU product compliance (non-exhaustive)

For products placed on the EU/EEA market, applicable frameworks include but are not limited to:

- Radio Equipment Directive (RED) 2014/53/EU – radio-enabled equipment.
- Low Voltage Directive (LVD) 2014/35/EU – electrical safety within voltage limits.
- Electromagnetic Compatibility Directive (EMC) 2014/30/EU – electromagnetic compatibility requirements.
- RoHS Directive 2011/65/EU (as amended) – restriction of hazardous substances in EEE.
- REACH Regulation (EC) No 1907/2006 – chemical substance obligations (including SVHC communication where applicable).
- WEEE Directive 2012/19/EU – take-back, marking, and reporting obligations for EEE.
- Batteries Regulation (EU) 2023/1542 – requirements for batteries and waste batteries where applicable.
- Packaging and packaging waste (Directive 94/62/EC and national implementing rules) and national Extended Producer Responsibility (EPR) schemes – producer registration, reporting, and fee obligations where applicable.
- Market Surveillance Regulation (EU) 2019/1020 – market surveillance and compliance obligations for products under EU harmonization legislation.

Where EU conformity requirements apply, the responsible function must ensure that required conformity assessments are completed, technical documentation is maintained, EU Declarations of Conformity are available where required, and the CE mark (and any other required markings) is correctly applied.

7.2 Global product compliance (principles)

- Products must meet applicable product safety and regulatory requirements in each market (e.g., safety standards, radio approvals, energy or environmental requirements or import conditions).
- Environmental and circularity obligations (including WEEE/Batteries/Packaging/EPR where applicable) must be satisfied, including registrations, reporting and joining producer take back schemes as required in each jurisdiction.

- Product compliance evidence (test reports, declarations, supplier documentation, technical files, conformity records) must be retained and made available to regulators and customers as required.
- As a distributor the Company may have a high degree of reliance on vendor-provided product compliance information, notifications, and declarations, we will apply a risk-appropriate and proportionate cadence for engaging vendors and obtaining required information, sufficient to support compliance activities in line with applicable legal obligations.

8 Governance, roles, and responsibilities

8.1 8.1 First line – business and operations

- Ensure accurate transaction data (end user, destination, parties) and do not bypass or otherwise circumvent processes and control or system holds.
- Follow established processes for order processing, shipping, and documentation.
- Escalate doubts, red flags, and incomplete information before proceeding.

8.2 8.2 Trade Compliance function

- Maintain and operate screening controls (including system configuration and list management where applicable).
- Ensure product export classifications and licence data are maintained and reviewed periodically.
- Manage licence applications, licence conditions, and regulatory communications (where applicable).
- Provide training, guidance, audits, and continuous improvement of the Internal Compliance Programme.
- Ensure retention of records for audit purposes are maintained for the necessary periods.
- Maintenance of process and procedure guides, including those required for maintenance of ISO certification.

8.3 8.3 Product Compliance function (or delegated owners)

- Maintain applicable product compliance obligations by market and product category.
- Ensure product compliance documentation is obtained from vendors/manufacturers and retained.
- Coordinate registrations or memberships and reporting for EPR and other environmental regimes or schemes where the Company is the obligated “producer” or importer of record.
- Support audits, regulator enquiries, and customer compliance requests relating to product conformity and environmental compliance.
- The Company will establish appropriate mechanisms or tooling to remain informed of relevant product compliance legal obligations and significant regulatory changes. Identified changes will be reviewed on a risk-based basis on its applicability, and compliance practices will be adjusted as appropriate to our obligation role in the supply chain and reliance on vendor-provided information.

8.4 8.4 Legal / Group Compliance

- Provide interpretation of complex or high-risk regulatory questions and advise on policy updates.
- Support investigations, disclosures, and regulator interactions where required.
- Maintain alignment with Code of Conduct and other corporate compliance policies.
- Dealing with escalations.
- Engaging external counsel where required
- Undertaking due diligence on new suppliers

9 Training and awareness

- Mandatory training must be completed by employees involved in trade and product compliance activities. Refresher training must be provided periodically when material regulatory or process changes occur. Employees must be able to recognise red flags (including diversion indicators) and understand escalation paths.

10 Enforcement and consequences

Violations of this Policy may result in disciplinary action up to and including termination of employment or contract and may expose the Company and individuals to civil and criminal penalties. The Company may suspend or stop transactions, seize or quarantine goods, and implement corrective actions as needed.

11 External reference sources (for guidance)

The following are examples of authoritative sources used to validate legal requirements and should be consulted as relevant. This list is not exhaustive.

- OFAC Sanctions Programs and Country Information: <https://ofac.treasury.gov/sanctions-programs-and-country-information>
- OFAC Sanctions List Search: <https://sanctionssearch.ofac.treas.gov/>
- EU Dual-Use Regulation (EU) 2021/821 (EUR-Lex): <https://eur-lex.europa.eu/eli/reg/2021/821/oj/eng>
- EU RoHS Directive 2011/65/EU (EUR-Lex): <https://eur-lex.europa.eu/eli/dir/2011/65/oj/eng>
- EU WEEE Directive 2012/19/EU (EUR-Lex): <https://eur-lex.europa.eu/eli/dir/2012/19/oj/eng>
- EU RED Directive 2014/53/EU (EUR-Lex): <https://eur-lex.europa.eu/eli/dir/2014/53/oj/eng>
- EU LVD Directive 2014/35/EU (EUR-Lex): <https://eur-lex.europa.eu/eli/dir/2014/35/oj/eng>
- EU EMC Directive 2014/30/EU (EUR-Lex): <https://eur-lex.europa.eu/eli/dir/2014/30/oj/eng>
- REACH Regulation (EC) No 1907/2006 (EUR-Lex): <https://eur-lex.europa.eu/eli/reg/2006/1907/oj/eng>
- EU Market Surveillance Regulation (EU) 2019/1020 (EUR-Lex): <https://eur-lex.europa.eu/eli/reg/2019/1020/oj/eng>
- EU Packaging and Packaging Waste Directive 94/62/EC (EUR-Lex): <https://eur-lex.europa.eu/eli/dir/1994/62/oj/eng>
- EU Batteries Regulation (EU) 2023/1542 (EUR-Lex): <https://eur-lex.europa.eu/eli/reg/2023/1542/oj/eng>

12 Appendix A – Minimum control expectations (summary)

- Maintain item classification (ECCN/ECN or equivalent) and customs classification (HS/HTS) where required.
- Screen parties and destinations using Company systems; investigate and resolve potential matches.
- Perform end-use/end-user checks where required; obtain end-user statements/undertakings when mandated.
- Obtain and document licences/authorisations where required; comply with licence conditions.
- Maintain records and audit trails; follow record retention policy.
- Escalate red flags and suspected violations immediately; use reporting hotline where appropriate.

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