

CHR028 Export Control Policy

Company Policy on Strategic Export Controls

Catena is committed to a policy of compliance with the strategic export control laws, regulations and procedures of all relevant jurisdictions and regimes in which it operates.

Export control is a complex regulatory area and the company itself can only cover a selection of the issues that face us globally every day. All employees need to ensure that they comply with applicable export and import laws and regulations when transferring goods, services, software or technology within their country or across national borders.

What are Strategic Export Controls?

Strategic Export Controls is the term applied to the control regimes that most countries apply to the export licensing or authorisation process by which exports of certain categories of goods, technology, software and services are 'approved'.

'Strategic Export Controls' could impact on the operations of Catena in four main areas:

1. Controls on the export of 'military' goods, software, related technology and services. These controls are applied by the state where the exporting business unit is located.
2. Controls on the export of 'dual-use' goods, software and related technology. These are also generally applied by the state where the exporting business is located. In the EU, they are applied by the EU Member State where that business unit is established. This means that the item could actually be exported from another Member State within the EU Single Market.
3. Extraterritorial application of regulations of some countries on the re-export of controlled goods, software, technology and services (both 'military' and 'dual-use'), regardless of the country where the business unit is located. This is particularly relevant to US Export Regulations, but also applies to the regulations of other countries.
4. 'End Use' and/or 'Destination' controls applied to 'dual-use' goods, software and related technology under some jurisdictions.

Commitment to Export Control Compliance

Catena's policy of compliance with the export control laws of all relevant jurisdictions and regimes in which it operates applies to:

- The physical transfer of controlled Goods, Software and Technology;
- The transfer of Technology using electronic media e.g. email and the use of the internet of shared data environments;
- The provision of Technical Services associated with defence programmes and services or equipment associated with Weapons of Mass Destruction (WMD);
- Transfers of US controlled Goods, Software or Technology to 'approved' foreign nationals or other legal entities wherever that transfer may occur

Advice from the IMS Manager or Managing Director should be sought where there is any doubt or question as to the legality or propriety of any export.