

## EXPORT CONTROL AND COMPLIANCE

StarLeaf recognises the importance and complexity of ensuring that international deployments of StarLeaf products are compliant with the various laws and rules which govern economic sanctions programs and export controls, as well as UK/EU/US antiboycott laws. Compliance with UK/EU/US laws relating to StarLeaf's international activities is a significant responsibility, and all partners involved in international business activities (defined as any product deployments which are not physically located in either the EEA and Switzerland, and/or the UK or the USA "EEA/CH/UK/US") should abide by this policy.

This document does not provide a comprehensive guide to every aspect of export compliance. It is intended to highlight the importance of compliance to StarLeaf's partners. Where required, further guidance can be obtained from StarLeaf's Export Compliance Officer ([exports@starleaf.com](mailto:exports@starleaf.com)).

Some StarLeaf products require export licenses for delivery outside of the EEA/CH/UK/US. The occasions when export licenses are needed are infrequent. If guidance is required, should check with [exports@starleaf.com](mailto:exports@starleaf.com).

### United Nations (UN) or UK/EU/US SANCTIONS LAW

When the UN imposes a comprehensive economic sanction on a certain country or territory then it becomes an illegal activity to ship/trade goods with the said country under UK/EU and US law. StarLeaf is committed to full compliance with this legal requirement in its entirety.

Under US Law, The Office of Foreign Assets Control within the U.S. Treasury Department maintains comprehensive economic sanctions and trade embargoes under a large number of sanctions programs. These fall into four basic groups: (1) comprehensive economic embargoes against entire countries; (2) limited sanctions against particular countries; (3) sanctions targeting specifically identified individuals and entities in particular countries because of acts they have committed that the United States wishes to punish; and (4) sanctions targeting specifically identified individuals and entities because of acts they have committed but that are not associated with any particular country (DPL - denied parties list).

(1) Comprehensive country-based sanctions are currently in effect against the following countries: **Iran, Sudan, North Korea and Cuba** ("Sanctioned Countries"). These comprehensive sanctions programs generally prohibit all business, trade (shipments to and from) and any other form of business activity with Sanctioned Countries and Sanctioned Country persons and companies. The U.S. no longer has comprehensive sanctions in place against **Iraq and Libya**; however, some exports and shipments to these countries require a specific license from the EU/UK/US governments prior to shipment.

(2) More limited OFAC sanctions are currently in force against **Burma (Myanmar) and Russia**.

(3) The UK/EU has more targeted sanctions on certain industries and individuals doing business in: **Myanmar, Crimea, Russia, Iraq, Syria, North Korea, Libya, Sudan and Somalia**.

(4) In addition, The UK/EU has a list of certain individuals and business entities that are sanctioned in their dealings with EU/UK companies. The list is quite extensive and is subject to frequent change.

It is StarLeaf's explicit corporate policy that none of its products should be supplied to anyone appearing one of these restricted lists.

Engaging in any activity or conduct intended to circumvent the above regulations is prohibited. In particular, it is contrary to StarLeaf policy for any partner to knowingly deliver any StarLeaf products to embargoed/sanctioned customers, countries or territories. Non-compliance with this policy will be considered a material breach of any StarLeaf reseller agreement and will result in a termination of that agreement.