

Export Controls Policy and Economic Sanctions Compliance

Introduction:

- Ileri Group is committed to complying with all applicable export control laws and economic sanctions in every market where we operate. This policy outlines the framework for ensuring lawful and ethical conduct in our international business dealings.

Policy Objectives:

- To uphold international security and foreign policy objectives.
- To prevent the proliferation of weapons of mass destruction and other sensitive technologies.
- To ensure Ileri Group does not engage in trade with sanctioned countries, entities, or individuals.

1. Export Control Compliance:

- Strict adherence to national and international export control regulations, including but not limited to those of the United Nations, European Union, and the United States.
- Regular updates to our compliance program in response to changes in export control laws and regulations.

2. Economic Sanctions Adherence:

- Compliance with economic sanctions imposed by governments and international bodies such as the UN, EU, and the US OFAC.
- Prohibition of unauthorized trade with sanctioned countries, entities, or individuals.

3. Training and Awareness:

- Regular training for Ileri Group employees on export control regulations and sanctions compliance.
- Ensuring that all staff involved in international trade are aware of the legal obligations and the consequences of non-compliance.

4. Due Diligence Procedures:

- Rigorous due diligence on customers and partners to ensure compliance with export controls and sanctions.
- Verification of end-use and end-users for exports to prevent diversion to unauthorized users.

5. Product Classification and Licensing:

- Accurate classification of goods, software, and technology as per export control lists.
- Obtaining necessary export licenses and ensuring proper documentation for all shipments.



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6. Record-Keeping and Reporting:

- Maintaining comprehensive records of all international transactions.
- Reporting any suspected violations of export controls or sanctions to the appropriate authorities.

7. Internal Audits and Compliance Monitoring:

- Regular internal audits to assess compliance with export controls and sanctions.
- Prompt action to rectify any identified deficiencies or violations.

8. Supplier and Partner Compliance:

- Requiring suppliers and business partners to comply with relevant export controls and economic sanctions.

Conclusion:

- Ileri Group is dedicated to conducting international business responsibly. Our Export Controls Policy and adherence to economic sanctions reflect our commitment to legal compliance and ethical business practices.

This document provides a concise yet comprehensive overview of Ileri Group's commitment to adhering to export controls and economic sanctions, ensuring responsible and legal international trade activities.



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