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Approved of: Marcus Lundevall, CFO		Approval date: November 25, 2024

## **EXPORT CONTROL & SANCTIONS POLICY**

### **1. Purpose**

Export controls and economic or trade sanctions ("Export Laws") are implemented in different countries around the world including, in particular, the US, the EU (and the EU Member States) and the United Nations.

Export Laws cover trade in goods, services, technology and the subsequent re-export of such goods, services, and technology. They limit or prohibit the supply of goods, technology, finance or other services to certain destinations or end-users and they are used by governments to promote foreign policy.

Nord-Lock Group must always comply with Export Laws regardless of where the regulations have its origin or wherever the business is conducted. It is important to comply with all relevant Export Laws which are in force in all the jurisdictions in which we operate and any additional jurisdictions where Nord-Lock Group commences operations and/or has an active registration or a license.

### **2. Scope**

This policy applies to:

Nord-Lock International AB and its subsidiary companies and joint ventures over which Nord-Lock International AB exercises management control (collectively, "Nord-Lock Group");  
All natural and legal persons (and their respective employees, officers and directors) that perform services for or on behalf of Nord-Lock Group, including supply chain, suppliers, consultants, contractors and distributors ("Nord-Lock Group Contractors").

Nord-Lock Group has nominated Jörgen Karlsson; [joergen.karlsson@Nord-Lock.com] as its Export Controls and Sanctions Compliance Officer (the "Compliance Officer") who shall be the key contact for all matters relating to exports and sanctions. Immediately notify the Compliance officer of any communications received from an export control authority.

### **3. Check list for export controls and sanctions**

Below is a three-step check list aiming to give practical guidance in judging whether a transaction may be subject to Export Control or Sanctions. The most important factor in making a correct judgement is customer knowledge. For support on the regulations and legislation, please contact Compliance Officer.

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### **Step 1: Export controls**

Export control laws restrict the export of controlled goods or goods intended for particular use, including the transfer of technology or intellectual property.

Please review and confirm the following questions regarding export controls:

- (1) Is the item a **military or defense material** or intended for **military use**?
- (2) Is there a demand for use of unusual and exotic material that may be subject to export control? (As of December 2020, the Nord-Lock Group product portfolio does not contain such products.)
- (3) Are we exporting complete production equipment?
- (4) Does the item require licensing due to local regulations relevant for your country?
- (5) Do you have **any reason to believe or to suspect** that the item, or part of it, could be used at any stage of the development of a weapon of mass destruction (WMD) /Missile program by the end-user?
- (6) Do you have **any reason to believe** that the end-user appears are under sanctions and is included on the denied persons or entities list? [Entity List, Denied Persons List, or Unverified List](#)

If you answered 'yes' to any of question above, then you are not allowed to conclude the transaction before obtaining approval from the Compliance Officer.

If you answered 'no' to all of the questions above, you must complete **Step 2** in order to check whether the country of destination or end-use is subject to sanctions.

### **Step 2: Sanctions**

Sanctions are political trade restrictions that are implemented against target countries, groups and individuals. Sanctions regimes also include anti-circumvention and facilitation rules, for example introducing a person from a sanctioned country to another person for the purpose of facilitating a prohibited transaction is also violation of sanctions.

Please review and confirm that the destination of the export **or** the location of the end-user does not appear in one of the countries/regions in the table provided in **the list** below. If it is, please follow the instructions or seek assistance from the Compliance Officer before concluding a transaction.

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### **List of countries/regions subject to sanctions**

Note that it is the location of the end-user which needs to be checked and therefore a sale to a company within, for example the EU, could potentially be subject to export control if such party intends to export the item outside of the EU.

Country	Sanction	Guidance
Iran	EU/US	No sales to be done
Syria	EU/US	No sales to be done
North Korea	EU/US	No sales to be done
Cuba	US	No sales to be done
Belarus	EU/US	No sales to be done
Russia and Crimea	EU/US	No sales to be done
Russia occupied territories in Ukraine	EU/US	No sales to be done.
Afghanistan	UN	Approval from Compliance Officer needed.
Armenia		Approval from Compliance Officer needed.
Azerbaijan		Approval from Compliance Officer needed.
Bosnia and Herzegovina	US	Approval from Compliance Officer needed.
Burma/Myanmar	EU	Approval from Compliance Officer needed.
Burundi	US	Approval from Compliance Officer needed.
Central African Republic	UN	Approval from Compliance Officer needed.
Democratic Republic of Congo	EU/US	Approval from Compliance Officer needed.
Ethiopia	US	Approval from Compliance Officer needed
Georgia		Approval from Compliance Officer needed
Guinea	EU	Approval from Compliance Officer needed
Guinea-Bissau	EU/UN	Approval from Compliance Officer needed
Hong-Kong	US	Approval from Compliance Officer needed
Iraq	US	Approval from Compliance Officer needed.
Kazakhstan		Approval from Compliance Officer needed.
Kyrgyzstan		Approval from Compliance Officer needed.
Lebanon	EU/US	Approval from Compliance Officer needed.
Liberia	US	Approval from Compliance Officer needed.
Libya	EU/US	Approval from Compliance Officer needed.
Mali	EU/US	Approval from Compliance Officer needed.

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<b>Montenegro</b>	US	Approval from Compliance Officer needed.
<b>Nicaragua</b>	US	Approval from Compliance Officer needed.
<b>Serbia</b>	US	Approval from Compliance Officer needed.
<b>Somalia</b>	EU/US	Approval from Compliance Officer needed.
<b>South Sudan</b>	EU/	Approval from Compliance Officer needed.
<b>Sudan</b>	EU/US	Approval from Compliance Officer needed.
<b>Tadzhikistan</b>		Approval from Compliance Officer needed.
<b>Tunisia</b>	EU	Approval from Compliance Officer needed.
<b>Turkmenistan</b>		Approval from Compliance Officer needed.
<b>Uzbekistan</b>		Approval from Compliance Officer needed.
<b>Venezuela</b>	EU/US	Approval from Compliance Officer needed.
<b>Yemen</b>	US	Approval from Compliance Officer needed.
<b>Zimbabwe</b>	US	Approval from Compliance Officer needed.

### **Step 3: Control questions**

If any of the red-flags (listed below) has been detected, then no transaction should be concluded before escalating the matter to the Compliance Officer and attaining approval. If none of the triggers above have been met, you are free to continue with the transaction.

#### **Red flags relating to suspicious transactions/enquiries**

**Nord-Lock Group Personnel should be suspicious if the following "red flags" are detected:**

- ✓ the customer is new to Nord-Lock Group and your knowledge about him/her is incomplete or inconsistent or it is difficult to find information about the customer;
- ✓ the end-user is tied to the military, the defense industry or a governmental research body and the stated end-use is civilian;
- ✓ the customer seems not to be familiar with the product and its performance characteristics (e.g. an obvious lack of technical knowledge);
- ✓ the contact information in enquiries (e.g. phone numbers, e-mail, addresses) is located in other countries than the stated company, or changed to that over time;
- ✓ the company website lack content in comparison to what is normally found on a legitimate company website;
- ✓ the customer is reluctant to offer information about the end-use of the items, provide clear answers to commercial or technical questions which are routine in normal negotiations or to provide an end-user statement;
- ✓ an unconvincing explanation is given as to why the items are required, given the customer's normal business, or the technical sophistication of the items;

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- ✓ unusual shipping, packaging or labelling arrangements are requested; usual incoterms for shipment, the sealing of containers/trucks and the confirmation of receipt by the consignee/end-user are refused;
- ✓ unusually favorable payment terms such as full payment in advance or want to do a full cash payment immediately;
- ✓ the payment is made by other parties than the customer or stated intermediaries and follow another route than the products;
- ✓ the installation site is in an area under strict security control or is in an area to which access is severely restricted, or is unusual in view of the type of equipment being installed;
- ✓ there are unusual requirements for excessive confidentiality about final destinations, or customers, or specifications of items;

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## 4. Annex 1 – Useful references, terms and definitions

**US Export Administration Regulations:**

US regulations administered by the Bureau of Industry and Security that impose export controls (15 CFR §730 et. Seq.).

**US Commerce Control List:**

[US Commerce Control List](#)

**Consolidated Screening List:**

[Screening list](#)

**Bureau of Industry and Security:**

The US agency responsible for overseeing and enforcing export controls on dual-use items. The Bureau of Industry and Security is part of the US Department of Commerce.

**Office of Foreign Assets Control:**

The US agency responsible for overseeing and enforcing US sanctions. The Office of Foreign Assets Control is part of the US Department of Treasury.

**Deemed Export:**

A release of controlled US-origin technology (e.g., blueprints, drawing, diagrams) to a non-US person.

**End-user:**

Final recipient of exported goods

**Controlled goods:**

Specific items (including technical data, documents, software and services) that cannot be exported to foreign nationals or representatives of a foreign entity, without first obtaining approval or a license.

**Catch-all provisions:**

Items which are not listed not in the Dual-Use Regulation but appear on a national list of controlled items because they may be used for WMD, nuclear purposes, military purposes, violation of human rights or acts of terrorism.

**List of US sanctions**

<https://sanctionssearch.ofac.treas.gov/>

**List of EU sanctions**

[https://eeas.europa.eu/headquarters/headquarters-homepage\\_en/8442/Consolidated%20list%20of%20sanctions](https://eeas.europa.eu/headquarters/headquarters-homepage_en/8442/Consolidated%20list%20of%20sanctions)

**EU sanctions map**

<https://sanctionsmap.eu/#/main>