

## CLEARSTAR EXPORT CONTROL POLICY

Version and Release Date: 1.0 6/15/2022  
Policy Owner: General Counsel

### 1. Purpose

This Export Control Policy (the "Policy") establishes Company's policy to be followed by all employees and contractors and has been approved by the senior management. The objective of this Policy is to ensure that Company's exports, deemed exports, re-exports, transfers, and activities are transacted consistent with the economic and trade sanctions requirements and other Applicable Laws. Various government agencies have a role in the management of our export transactions and compliance with export laws and regulations. It is Company's expectation that each employee and contractor understand the standards described and the importance of creating a synergistic system to manage the overall export responsibilities.

### 2. Introduction

The United Nations, the European Union and the United States have imposed restrictive economic and trade sanctions against certain countries with the aim of achieving a change in activities or policy against targeted foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. Other countries in which Company operates may also have imposed their own restrictive measures. It is the policy of Company to adhere to the legal restrictive economic and trade sanctions imposed by the countries in which it operates. Company takes its responsibility for compliance with the economic and export control requirements very seriously and may in some cases use a more restrictive policy, based upon its own risk analysis.

A vital part of this Policy is the establishment of mechanisms within the company's daily operational procedures that provide checks and safeguards at vulnerable points of the system. Such checks and safeguards help to ensure that the right questions are being asked to preclude making shipments that are contrary to export controls, and therefore inconsistent with this company's best interests. A soundly implemented policy and procedure, coupled with good judgment, can greatly reduce the risk of inadvertently exporting to a restricted end-user, or exporting for a prohibited end-use or activity. To ensure the integrity of this system, individual feedback and suggestions for strengthening the procedures are encouraged.

All Company employees, contractors, distributors and the resellers are urged to get prior approval from Company Group Finance Controller when you are considering carrying out the business with any person or entity operating from the sanctioned territories or may be considered as a Restricted Party. Our insurance policies will not cover any liabilities arising from or related to a business operating from the sanctioned territories or with the Restricted Parties. If there are any business activities with these territories without prior approval of Company, you run the risk that Company, under the legal provisions and/or the derived internal policies, will not perform these transactions. Notwithstanding above, Company may carry out internal or external assessments on any business transaction to ensure the compliance with the Applicable Laws and may approve such business transaction that it reasonably believes to be in compliance with the Applicable Laws.

### 3. Restricted Party

For the purpose of this Policy, a Restricted Party means a person or entity: (a) targeted by national, regional, or multilateral trade or economic sanctions under the applicable laws; (b) designated on the United Nations Financial Sanctions Lists, European Union

(EU) or EU Member State Consolidated Lists, US Department of the Treasury Office of Foreign Assets Control Lists, US State Department Non-proliferation Sanctions Lists, or US Department of Commerce Denied Persons List, in force from time to time; (c) who are affiliate or subsidiary of the person or entity restricted under (a) and (b) above; and (d) who are acting on behalf of the person or entity restricted under (a), (b) or (c) above.

### 4. Applicable Laws

For the purpose of this Policy, Applicable Law means all applicable laws and regulations concerning the import, export, or re-export of goods, software, or technology, or their direct product, including but not limited to: (a) applicable customs regulations, Council Regulation (EC) No. 428/2009; (b) any sanction regulations issued by the Council of the European Union; (c) the International Traffic in Arms Regulations ("ITAR"); (d) the Export Administration Regulations ("EAR"); and (e) the regulations and orders issued or administered by the US Department of the Treasury, Office of Foreign Assets Control in relation to export control, anti-boycott, and trade sanctions matters.

### 5. Screening

Where applicable, Company will perform a due diligence/KYC on customers, suppliers and partners, in the form similar to Annex 1 to this Policy. If any customer, supplier or partner (or their holding company or major shareholder) is found operating from a country listed in Annex 2, this shall be flagged to Group Finance Controller for further review.

### 6. Disclosure Notice

Company may notify its customers, suppliers and partners that it maintains an export control policy and restricts the sale, use, and resale of its products or services to the extent such transaction may violate any applicable export control laws. The notice must be substantially similar to the following:

#### *RESTRICTIONS ON EXPORT AND USE OF COMPANY PRODUCTS AND SERVICES:*

*The United Nations (UN), the European Union (EU) and the United States (US) have imposed restrictive measures ('sanctions') against certain countries with the aim of achieving a change in activities or policies. Other countries in which Company operates may also have imposed their own restrictive measures. It is the policy of Company to adhere to the legal restrictive economic and trade sanctions imposed by the countries in which it operates. Company takes its responsibility for compliance with the economic and export control requirements very seriously and may in some cases use a more restrictive policy based upon its own risk analysis. All Company staff, distributors and resellers are prohibited from doing business with any of the persons, entities or countries specified on any restrictive measures or sanctions by UN, US, EU or other applicable countries, unless approved by Company.*

*All Company employees, contractors, resellers and distributors are urged to get prior approval from Company Group Finance Controller when they are considering to carrying out the business with persons, entities, or countries against which any restrictive measures have been imposed. Company's insurance policies will not cover any liabilities arising from or related to a business operating from the sanctioned territories or offered to an entity or person within the sanctioned territories. If there are any business activities with these territories without prior approval of Company, you run the risk that Company, under the legal provisions and/or the derived internal policies, will not perform these transactions.*

## 7. Notice to Authorities

If Company suspects or determines that a customer, supplier or partner fall under the definition of Restricted Party, or any unauthorized or illegal activities may have taken place, Company will reject the transaction and/or block such party's assets and may report to concerned authorities as required by the Applicable Laws.

## 8. Contact

For any questions, feedback and suggestions related to this Policy, please contact the Group Financial Controller.

### ANNEX 1

KNOW YOUR CUSTOMER	
Name of client, country of operation, country of its controlling part, and any details on shareholders/listing.	
The customer or purchasing agent is reluctant to offer information about the end use (or end-user) of a product.	YES __ NO __
The customer has little or no business background. For example, financial information unavailable from normal commercial sources and corporate principals unknown by trade sources.	YES __ NO __
The customer is willing to pay cash for a very expensive item when the terms of the sale call for financing.	YES __ NO __
The customer is unfamiliar with the product's performance characteristics but still wants the product.	YES __ NO __
The customer declines routine installation, training, or maintenance services.	YES __ NO __
When questioned, the buyer is evasive or unclear about whether the purchased product is for domestic use, export, or re-export.	YES __ NO __
Customer uses only "P.O. Box" address or has facilities that appear inappropriate for the items ordered.	YES __ NO __
Customer is known to have, or is suspected of having, unauthorized dealings with embargoed countries.	YES __ NO __
KNOW YOUR PRODUCT	
The product's capabilities do not fit the buyer's line of business: for example, a small bakery places an order for several sophisticated lasers.	YES __ NO __
The product ordered is incompatible with the technical level of the country to which the product is being shipped. For example, semiconductor manufacturing equipment would be of little use in a country without an electronics industry.	YES __ NO __
Customer's order is for parts known to be inappropriate, for which the customer appears to have no legitimate need (e.g., there is no indication of prior authorized shipment of system for which the parts are sought).	YES __ NO __
DELIVERY	
Delivery dates are vague, or deliveries are planned for out-of-the way destinations.	YES __ NO __
A freight forwarding firm is listed as the product's final destination.	YES __ NO __
The shipping route is abnormal for the product and destination.	YES __ NO __
Packaging is inconsistent with the stated method of shipment or destination.	YES __ NO __

### ANNEX 2

Afghanistan	Congo Dem. Rep	Haiti
Angola	Equatorial Guinea	Honduras
Antigua & Barb.	Cuba	Iran
Azerbaijan	Djibouti	Iraq
Bahamas	Dominican Rep.	Kazakhstan
Belarus	Ecuador	Kenya
Belize	El Salvador	Kiribati
Benin	Eritrea	Kyrgyzstan
Bhutan	Ethiopia	Laos
Burundi	Gambia	Latvia
Bolivia	Guatemala	Lebanon
Chad	Guinea	Liberia
Congo Cent. African Rep	Guinea-Bissau	Libya
Madagascar	Paraguay	Trinidad & Tobago
Mali	Sao Tome & Principe	Tunisia
Mauritania	Serbia (incl. Kosovo)	Turkmenistan
Micronesia	Sierra Leone	Tuvalu
Moldova	Somalia	Uganda
Myanmar	Sudan	Ukraine
Nicaragua	South Sudan	Uzbekistan
Niger	Suriname	Vanuatu
North Korea	Swaziland	Venezuela
Pakistan	Syrian	Western Sahara
Palestine, State Of	Tajikistan	Yemen
Panama	Tanzania	Zambia
Papua New Guinea	Tonga Timor-Leste	Zimbabwe