

Evoca Group

Export Control Policy

Version Control Table

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Scope and Definitions

Scope

This policy on export control (hereinafter referred to as the “**Policy**”) applies to any director, executive, employee, collaborator (hereinafter “**You**” or the “**Recipients**”) of all companies of Evoca Group, this latter composed of Evoca S.p.A. and all its direct or indirect subsidiaries worldwide (all and each of them also referred to as “**Evoca**”).

Definitions

For the purposes of the Policy, in addition to the definitions contained in other parts of the Policy, the terms hereinbelow shall have the following meaning:

- “**Export**” shall mean:
 - an export procedure and a re-export within the meaning of the applicable legislation;
 - transmission of software or technology by electronic media (including fax, electronic mail or any other electronic means) to legal and natural persons and partnerships. Export also applies to oral transmission of technology when the technology is described over the telephone;
- “**License**” shall mean all the possible authorizations, permits, licenses *et similia* needed for the export of the Products;
- “**Product(s)**” shall mean the product(s) object of Export by Evoca, including the relevant service of technical assistance;
- “**Restrictive Measures**” shall mean any restrictive measure, sanctions and embargoes adopted by competent authorities all over the world towards countries where, or subjects to whom, Evoca wants to sell its Products;
- “**Export Control Laws**” shall mean any law, regulation and enforceable act, whether of national, EU, U.S. or international nature, regarding trade control and that may provide Licenses and/or Restrictive Measures for certain sales of Products in specific countries or to designated individual or entities.

Compliance with Export Control Laws

General Principles

It is Evoca’s express policy to full comply with all Export Control Laws as they apply to Evoca. In order to achieve this, the following general principles have to be respected:

- **Under no circumstance can Exports of Products be made against Export Control Laws** by any Recipient or subject operating on behalf of Evoca.
- **All transactions are subject to a screening process** in order to assess and determine whether or not a transaction is subject to trade controls.
- **Full cooperation** is given to the trade control competent authorities of the States where Evoca operates in all matters regarding Export;
- **Books and records** must accurately and timely reflect all transactions and relationships with the competent authorities and be kept for the period provided for in the national legislation of the State where Evoca is established.

Country Prohibitions

The export controls of the European Union (EU) and the Member States apply to transactions involving certain countries subject to embargoes and controlled individuals. Restrictive Measures imposed by the EU may target governments of third countries. These prohibitions also apply to undertaking work in or selling products to any entity that is located in any of these countries, or to any entity that is owned or controlled by the government of any of these countries, regardless of where the entity is located. They may include arms embargoes, other specific or general trade restrictions (import and export bans), financial restrictions, restrictions on admission (visa or travel bans), or other measures.

For the current status of EU sanctions check this page: <https://www.sanctionsmap.eu/#/main>.

The U.S. imposes sanctions on a number of countries in which U.S. persons and companies or companies controlled by U.S. entities or individuals located in the territory of the U.S. may not do business. The Office of Foreign Assets Control (OFAC) of the United States Department of Treasury frequently modifies the list of countries and/or the degree of restrictions in place with respect to any such country.

Updated information in this respect can be found at: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>.

From time to time, other countries may be added to the OFAC list, and accordingly, it shall be the responsibility of each Recipient to consult with the Legal Department of Evoca S.p.A. if there are any questions in respect to a particular jurisdiction.

In addition, other countries in which EVOCA conducts business may impose similar trade sanctions and restrictions with respect to one or more of the same or other countries.

Entity Prohibitions

The EU and the U.S. and other governments maintain several lists of persons, groups and entities with whom their companies cannot do business, and EVOCA Recipients involved in international trade should routinely check those lists when doing international trade business (please refer to the links in the above paragraph "Country Prohibitions").

If any Recipient or agent of EVOCA has reason to believe that any export or re-export may be intended for an inappropriate end-use, end-user, or destination, or the consummation of such export or re-export may be in violation of applicable EU or U.S. or any other Export Control Laws, such person shall halt the transaction and contact the Legal Department of Evoca S.p.A. in order for the company to conduct a due diligence.

Transaction screening process

General remarks

Evoca has established a process to evaluate and determine whether or not a transaction is subject to Export Control Laws.

This process is divided into:

- item classification;
- transaction risk assessment;
- Licence determination and application; and
- post-licencing.

Items classification

Item classification is about determining the characteristics of the Products, in case they may be relevant under the Export Control Laws (e.g. whether they can be classified as dual-use items).

Prior to proceeding with any transactions, You must always, first of all, check whether the Product is subject to Restrictive Measures imposed by Export Control Laws.

Transaction risk assessment

In each and all transactions, You must then ensure that none of the involved parties (intermediaries, purchaser, consignee or end-user) and countries are subject to Restrictive Measures by consulting the webpages indicated in the above paragraphs “Country Prohibition” and “Entity Prohibition” and, in any case, the relevant official lists made available by the competent authorities.

Licence determination and application

Once positively concluded the process of transaction risk assessment, You must determine whether a Licence is needed in relation to the specific Export of Products and, in the positive, apply for it following the relevant procedure of law.

Where the Export requires a Licence and this latter is attained, You must strictly adhere to the relevant terms and conditions.

In the event that a Licence is not required, You must proceed with the post-licencing activities set out in the next paragraph, excluding those referring to the Licence.

Post licencing

Before the actual shipment, a final check is to be conducted as to whether all steps regarding Export compliance have been taken, double-checking, in particular, if:

- items are correctly classified;
- the screening of entities and countries was done; and
- whether there is a valid Licence for the shipment (where needed).

This final check shall involve the Legal Department of Evoca S.p.A., that will have faculty of stopping or putting on hold the Export of Products when any of the above requirements is not met. In doing so the Legal Department of Evoca S.p.A. can avail of any function in the company.

The Products shall be released by the Legal Department of Evoca S.p.A. solely when it receives written confirmation from the competent function(s) that all the above requirements are met.

Furthermore, a final transaction risk assessment is necessary in case a change of relevant legislation took place in the meantime (e.g. the customer is now listed among sanctioned entities).

You must ensure that all the terms and conditions of the licence (where needed) have been complied with, including reporting, where requested.

In case of Export of a Product subject to Licence, should the Licence be annulled, revoked, suspended or modified, Evoca shall interrupt the Export or proceed with it according to the new terms set out in the amended Licence.

Utmost collaboration is given by Evoca to the competent authorities, especially duly and readily answering their request for information or documents or allowing their lawful inspections, where provided.

Violation of the Policy

Failure to comply with applicable Export Control Laws could result in civil or criminal penalties, including, but not limited to, fines, imprisonment loss of export privileges, debarment, revocation of previously approved licenses, seizure and forfeiture of goods. Such penalties may be imposed on Evoca, individuals employed by or otherwise affiliated with Evoca, or any combination thereof.

Recipients or Evoca agents and partners who knowingly violate such Export Control Laws or this Policy will be subject to appropriate disciplinary action.

You may report any circumstances, that are allegedly in breach of this Policy and/or of the Export Control Laws to the Legal Department of Evoca S.p.A. or, in case of subsidiary, to the management body, that will promptly inform the Legal Department of Evoca S.p.A.

All reported circumstances will be promptly and thoroughly verified by a specifically appointed person and the investigation shall be conducted in a confidential manner, protecting at the utmost level, where possible, the identity of the person disclosing the information.

A detailed report will be drafted at the end of the investigation.

In the case of ascertained violation of the Policy or of the Export Control Laws, the report will be submitted to the competent functions for deciding the appropriate disciplinary actions to be taken.

Otherwise, the case will be archived.

Status and revision of the Policy

This Policy is meant to be an integral part of Evoca Code of Ethics, which contains core principles on how Evoca conducts business, and sets out Evoca's global minimum standards on export control.

Local laws and regulations may set stricter requirements, in which case these stricter local requirements need to be implemented by the local organization to ensure there is no conflict with this Policy.

The Policy will be periodically revised by the Legal Department of Evoca S.p.A.

Once revised, the Policy is transmitted to the Board of Directors of Evoca S.p.A., that resolves on its final approval, and then made available by the Legal Department of Evoca S.p.A. to all the companies of Evoca Group.

Note to Employees

If You have any questions or concerns regarding this Policy or the Export Control Laws, You are required to contact the Legal Department of Evoca S.p.A.