

# WALDOM ELECTRONICS CORPORATION



## EXPORT MANAGEMENT AND COMPLIANCE MANUAL

**Prepared by:** Seko Logistics

**Approved by:** Dave Tenorio – Director of Global Logistics and Trade Compliance

**Date of Revision:** January 11, 2024



DATE: January 11, 2024  
TO: All Waldom Electronics Employees  
FROM: Don Akery, Chief Executive Officer (CEO)

**SUBJECT: U.S. Export Control Policy Statement**

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Waldom Electronics Corporation (“Waldom Electronics”) is committed to compliance with all U.S. Export Control Laws and Regulations, which reside in the Export Administration Act and the Export Administration Regulations. This commitment extends to promoting strict compliance on an on-going basis with terms and conditions throughout our company.

It is Waldom Electronics policy that all employees, comply with the United States export policies and regulations. Under no circumstances will exports be made contrary to U.S. export regulations by any individual operating on behalf of Waldom Electronics.

Employees outside the United States may not re-export any commodity, technology, or software unless appropriate authorization has been obtained, and this includes foreign-produced items that are the direct product of U.S. technology and software and are subject to export controls under the Export Administration Act.

No activities will be undertaken that are in violation of the United States policies which seek to control nuclear proliferation, missile technology, and chemical and biological weapons.

Failure to comply with these regulations may result in the imposition of criminal and/or civil fines and penalties, including jail time and monetary penalties against the Company and/or employees. Offending parties will be subject to disciplinary action and/or termination.

I ask each of you to take this matter very seriously and to support me in this effort. If you have any questions concerning the legitimacy of a transaction or potential violations, please contact:

Dave Tenorio  
Director of Global Logistics & Trade Compliance  
*E-mail: david.tenorio@waldom.com*

**Note:** This Statement of Corporate Commitment to U.S. Export Control Compliance will be issued as necessitated by personnel changes, changes in management, or regulatory changes.

The responsible official is responsible for disseminating this statement throughout the organization through: Waldom Electronics Export Control Compliance Program, Manual updates, incorporation into training and presentations, and posting on Waldom Electronics Intranet and Web Site.

Don Akery, Chief Executive Officer

Signature

Donald R. Akery

Date

January 21, 2024

WALDOM ELECTRONICS CORPORATION  
U.S. EXPORT CONTROL POLICY  
EMPLOYEE ACKNOWLEDGEMENT

All employees are required to read and sign the following verification statement and submit it to the Human Resources Office to be filed in their personnel file.

I hereby acknowledge that I received the Waldom Electronics policy statement dated January 11, 2024, and signed by Don Akery, Chief Executive Officer, regarding the company's commitment to export control compliance. I have read this policy statement and will comply with Waldom Electronics export control compliance policies and procedures in support of Waldom Electronics compliance efforts.

Employee Name : \_\_\_\_\_

Employee Title : \_\_\_\_\_

Employee Signature : \_\_\_\_\_

Date : \_\_\_\_\_

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# Export Control Compliance Manual

Waldom Electronics is committed to strict adherence to all U.S. export control laws and regulations including the Export Administration Regulations (EAR) with all applicable export requirements pursuant to U.S. law. This includes, but is not limited to, those laws administered and enforced by the U.S. Department of Homeland Security, U.S. Department of State, the U.S. Department of Commerce, Bureau of Industry and Security, U.S. Department of Treasury and Office of Foreign Asset Control.

Administrative, civil, and criminal penalties exist for violations of export control laws and may be imposed against the Company and/or individual employees. Because of serious consequences associated with failing to comply with U.S. export control laws and regulations all employees must be aware of their obligations for full compliance.

This manual has been developed in line with the U.S. Export Controls and will enable Waldom Electronics to have a live U.S. Export Control Compliance Program. The manual contains export reference material, policies, and procedures to be used as your main source of information – a learning tool at your fingertips.

Waldom Electronics provide their clients with export services therefore, it is the company and employees' responsibility to know and understand the legalities, rules and regulations involved in international transactions. Specifically, U.S. Export Controls.

The Export Control Compliance Manual will be maintained and distributed by the Director of Global Logistics and Trade Compliance. The Manual will be posted on the company's intranet and be made available to all employees. Manual changes are called revisions and will be done on an as needed basis i.e., regulatory changes, company changes in export policies and/or processes.

Human Resources will, as part of the onboarding process, introduce all new employees to the Waldom Electronics U.S. Export Control policy and concurrently execute the Employee Acknowledgment form. The department head is tasked with reviewing the manual with the new employee.

Any person currently employed at the time of the first publication of the manual will be trained by the department head. This initial introduction should be presented by the person responsible for exports. The training log is in Appendix B of the manual.

## 1. WALDOM ELECTRONICS CORPORATION U.S. EXPORT CONTROL COMPLIANCE COMMITMENT POLICY

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*This global policy ensures that Waldom Electronics Corporation (“Company” and its subsidiaries and affiliates), comply with the applicable export, re-export trade laws and conducts its business ethically and in compliance with all laws in countries where the Company does business. This policy applies to all officers and employees of the Company. We expect the same from our clients. The Export Control Compliance Policy and Manual has been designed to ensure the Company’s commitment to compliance with the laws and regulations of Export Controls. Trust, integrity, and accountability are critical elements of our culture as an organization and are fully represented in our compliance program.*

*The United States maintains a complex set of export laws and regulations administered by several different agencies that govern the export and re-export of goods, technology, and services from the U.S. to foreign destinations. The U.S. Export Administration Regulations (EAR) is administered by the U.S. Department of Commerce’s Bureau of Industry and Security (BIS), regulate exports and re-exports of commercial and dual-use items including hardware, software, and technology. In addition, items that have a predominantly commercial end use but that also have some military utility, including hardware are included.*

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All Waldom Electronics employees, no matter where they are located, are required to comply with the Company’s policy and procedures. Employees who have the principal responsibility for US exports are to use the Company’s U.S. Export Control Compliance Manual for reference, educational, policy, processes, and procedures purposes. The departments and parties effected can be administration, operations, finance, quality, and compliance, including affiliates outside the US laws. This is not simply a matter of national interest, but a matter of Waldom Electronics and our clients’ interest, since violations can subject us to severe penalties, including fines, denial of export privileges and even imprisonment. Waldom Electronics employees will be subject to company disciplinary action in the event the employee is deemed to have willfully violated U.S. laws governing exports.



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*Senior Management of Waldom Electronics are fully committed to ensuring export compliance and the act of complying with the United States export policies and regulations are adhered to. The company expects every director, manager, and employee to share in that commitment.*

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Thanks in advance for your cooperation. please send your email with questions to: [tradecompliance@waldom.com](mailto:tradecompliance@waldom.com).

Sincerely,

Don Akery  
CEO

A. Record of Revisions

<b>Revision #</b>	<b>Description</b>	
1	Original Document Issuance	January 11, 2024

## 2. WALDOM ELECTRONICS. EXPORT COMPLIANCE POLICY

### A. Introduction

Waldom Electronics Corporation (“Company”) is an online distributor of electronic components, and a Master Distributor of both electronic and electrical components, who sells exclusively to Distributors. The Company provides domestic and international services to our clients. The company has created the U.S. Export Control Compliance Policy and Manual to show commitment and support in handling exports in a compliant manner. Exports are the goods and services that a country produces domestically, or within the borders of its own country, and sells to buyers in a foreign country. The United States has a complex set of federal laws and regulations governing how information, technologies, and commodities are exported. The Bureau of Industry and Security (BIS) regulates exports of most commercial items and certain defense items through the Export Administration Regulations (EAR). The exporter is principally responsible for export compliance and certainly will be the first focus if any violation occurs. The Foreign Trade Regulations (FTR) contain the regulatory requirements for filing the Electronic Export Information (EEI) in the Automated Export System (AES) system of record and is the foundation for collecting, compiling, and disseminating export trade statistics for the U.S. The EEI collected through the AES also strengthens the US government’s ability to prevent the export of certain items to unauthorized destinations or end users, because the AES aids in targeting and identifying suspicious or illegal shipments prior to exportation. These regulations including other participating government agency (PGA) requirements are what this manual is focused on. The Company is committed to giving all Waldom employees the export control compliance tools necessary to perform their jobs in an efficient manner.

### B. Applicability

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*This Export Compliance Policy is applicable to all employees and operations of the Company throughout the world.*

*This Policy is particularly important for employees who are directly involved with exports and those who participate in the sale or shipment of products, and services to non-U.S. destinations.*

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Employees also must keep in mind that an export can occur not only by shipping products or technology to another country, but also by other export activities, i.e. deemed exports. The

meaning of “deemed export” is any release of technology or source code subject to the EAR to a foreign national. If regulated information or technology is released to a foreign national living in the U.S., it is deemed to be an export to the home country or countries of the foreign national. This holds true for industrial espionage situations as well as national security concerns. Under the EAR, the release of technology to a foreign national in the U.S. is “deemed” to be an export, even though the release took place within the United States. Deemed exports may occur through such means as a demonstration, trade show, conference, oral briefing, or plant visit, as well as the electronic transmission of non-public data.

### C. Employee Responsibility

The Director of Global Logistics and Trade Compliance or designated party is responsible for the monitoring of the export process’ and for the application of this Export Compliance Policy. Managers of each department are responsible for ensuring development and implementation of procedures to ensure compliance with applicable export laws and regulations. Refer to Section 3 for further details on the Director of Global Logistics and Trade Compliance’s responsibilities.

The Manager of any operating unit that has responsibility for exports or export-related activity is tasked with developing and implementing compliant policies and procedures relating to said activities within their group.

Any employee who becomes aware of a potential violation of export control laws or regulations shall promptly report these concerns to their immediate supervisor and the Director of Global Logistics and Trade Compliance, or designated party.

Any employee who condones or permits noncompliance with export control laws or regulations will be subject to disciplinary action by the Company, up to and including termination of employment.

The Company has established an Export Compliance Committee which will assist in the facilitation and implementation of Waldom Electronics Export Compliance Policy. Refer to Section 4 for further details on the Export Compliance Committee’s responsibilities.

## 3. DIRECTOR OF GLOBAL LOGISTICS AND TRADE COMPLIANCE

The Director of Global Logistics and Trade Compliance or designated party is responsible for ensuring day-to-day monitoring of all exports of the operating unit and for its compliance with export compliance procedures. Duties to be performed, either directly or indirectly, include:

- Reviewing and complying with the requirements of the Company’s Export Control Compliance Policy and this Export Control Compliance Manual.
- Implementing a procedure/policy to notify the Director of Global Logistics and Trade Compliance immediately upon learning a situation has occurred which needs to be addressed at the Compliance Manager’s level including but not limited to:
  - Need for a license.

- License exception.
  - Failure of a denied parties screening.
  - Red Flag identified.
  - Any concern regarding a request that does not feel right.
  - Show the employee where the issue is in the Export Control Compliance Manual.
- Coordinating determination of the jurisdiction
- Using freight forwarders (Appendix F)
- Bureau of Industry and Security (BIS) and/or commodity classification of each item which may be exported. The Export Administration Regulations (EAR) export product Commerce Control List (CCL) classification applies to dual-use items. Classification is the process of identifying which specific segment of the relevant regulations applies to the item.
- Ensuring proper “Screening” process for each shipment, every day. Recommend using the Consolidated Screening List Search Engine. <https://www.trade.gov/consolidated-screening-list>.
- Applying for and obtaining all necessary licenses and approvals for exports. The BIS regulates export licenses. Use SNAP-R Export License Applications when applicable. The applicant company requests authorization for the company to submit export license applications, reexport authorization requests, AGR license exception notifications, and classification requests to the Bureau of Industry and Security (BIS) using BIS's Simplified Network Application Processing (SNAP-R) system. The company understands that an electronic submission has the same legal force and effect as a written submission. The company recognizes that in order to apply for export licenses (as opposed to reexport authorizations, notifications or classification requests), the company must be in the United States.
- The company agrees that each submission made via SNAP-R shall constitute a certification.
- The principal interface with the “export regulatory” agencies.
- Providing oversight for export compliance education and awareness to all employees involved with export activities.
- Preparation and oversight of export compliance “assessments” companywide.
- Assuring that contractual agreements that apply to Export Compliance include provisions for compliance with applicable U.S. export statutes and regulations and for termination or cancellation if applicable laws or regulations preclude export.

Ensure export records for all export transactions are kept for 5 years from the date of export. If the records are paper, file in a secure area - electronic records are acceptable. The export transaction must be made available in printed form when requested (*See*, § 762.2 RECORDS TO BE RETAINED). If the Director of Global Logistics and Trade Compliance is not available, please refer inquiries and requests to: (see Appendix C).

## 4. EXPORT COMPLIANCE TEAM

### A. General

The principal responsibilities of the team are to oversee the export compliance process at the top line level and assist the Director of Global Logistics and Trade Compliance or designate when necessary.

### B. Membership of Export Compliance Team

The members of the Export Compliance Committee shall be appointed by the Director of Global Logistics and Trade Compliance (or designate) and shall include at least one member of senior management and one or more members from the finance, administrative, operations, or sales teams.

In addition, the Export Compliance Committee may utilize the assistance of other employees of the Company, retain support staff, and engage outside experts it deems helpful or necessary in performing its function. All questions concerning the implementation of this policy, or its interpretation shall be directed to the Export Compliance Committee.

Reference Appendix C for current Members of the Export Compliance Committee.

## 5. PRODUCT EXPORT CLASSIFICATION REVIEW

Exporting a commodity, technology, or service without first determining the accurate jurisdiction and classification for export can expose the exporter to potentially severe penalties and fines. To be “export compliant,” a company must know how its products fit within and are affected by export regulations. Each product or item – (product, commodity, technology, or software) – must be reviewed to determine which government agency has export jurisdiction over the item, and hence controls the export. Additionally, the proper category or export classification of the item must be determined. Classification of products is important both for U.S. companies and for those non-U.S. companies whose government regulations include lists or annexes of export-controlled items.

### A. Determining Agency Jurisdiction

The process of determining correct jurisdiction and classification is complicated and usually requires extensive experience and an understanding of the export control regulations. Jurisdiction refers to determining the section of export regulations that govern the item including EAR which applies to dual-use items. *Both agency Jurisdiction and export classification are essential in assessing whether an export license is required.*

There are the two government agencies that have significant control over virtually all tangible and intangible commodities exported from the U.S. Jurisdiction refers to the section of export regulations that govern:

- 1) U.S. Department of Commerce - U.S. Export Administration Regulations (EAR)
- 2) U.S. Department of State - International Traffic in Arms (ITAR).

Waldom Electronics Does not currently engage in any activities, shipments or services related to or within the jurisdiction of, the International Traffic in Arms Regulations (ITAR). Therefore, U.S. Department of Commerce and the Export Administration Regulations (EAR) is the only agency you must deal with when you have an Export Jurisdiction and Classification shipment which may require a license.

The usual first step is to determine which government agency to choose from the above paragraph; for Waldom it will always be EAR export jurisdiction and classification.

### **B. Commerce Control List (CCL) – Export Control Classification Number (ECCN) Classification**

A key to determining whether an export license must be obtained from the Department of Commerce is finding out if the item you intend to export has a specific Export Control Classification Number (ECCN). ECCNs are five-character alpha-numeric designations used on the Commerce Control List (CCL) to identify dual-use items for export control purposes. An ECCN categorizes items based on the nature of the product, i.e., type of commodity, software, or technology and its respective technical parameters.

An ECCN is different from a Schedule B number, which is used by the Bureau of Census to collect trade statistics. It is also different from the Harmonized Tariff System Nomenclature, which is used to determine import duties.

All BIS ECCNs are listed in the Commerce Control List (CCL) (Supplement No. 1 to Part 774 of the EAR), which is divided into ten broad categories, and each category is further subdivided into five product groups. The first character of the ECCN identifies the broader category to which it belongs, and the second character identifies the product group.

#### **Items not on the Commerce Control List – EAR99...**

If your ECCN item falls under the jurisdiction of the U.S. Department of Commerce and is not listed on the CCL, it is designated as EAR99. Most commercial products are designated EAR99 and generally will not require a license to be exported or reexported. However, if you plan to export an EAR99 item to an [embargoed or sanctioned country](#), to a [party of concern](#), or in support of a [prohibited end-use](#), you may be required to obtain a license.

Determination as to whether you need authorization to export is determined by the following criteria in the transaction: 1) what is the ECCN of the item; 2) where it is going; 3) who is the end-user; and 4) what is the end-use. While most U.S. commercial exports do not require a license, the first step in this process is determining the correct ECCN classification of your item.

If your item is subject to the jurisdiction of the U.S. Department of Commerce, you must then determine if your item has a specific [Export Control Classification Number \(ECCN\)](#) found on the [Commerce Control List \(CCL\)](#). Keep in mind that items subject to the Export Administration Regulations (EAR) that are not listed on the CCL are designated EAR99.

### *Go to the Source.*

The best and most accurate way to determine what the commodity ECCN number is, is to contact the manufacturer, producer, or developer of the item you are exporting to see if they have previously classified their product and can provide you with the ECCN. If they have exported the item in the past, it is likely they have the ECCN. Keep in mind that ECCNs may change over time, so please review the ECCN to be sure you concur with their assessment.

### *Self-Classify.*

In order to perform a self-classification, you must have a technical understanding of your item, and you need to be familiar with the [structure and format of the CCL](#). The CCL is divided into ten categories, represented by the first digit of the ECCN. Each of the ten categories is divided into five product groups, represented by the second digit of the ECCN. Once the appropriate category and product group are identified, match the unique characteristics and functions of your item to one of the specific ECCNs that follow.

You can also utilize the [Commerce Control List Index](#) to navigate the CCL. Begin by searching for your item on the CCL Index. When you find a potential ECCN, you must then read the complete ECCN entry on the CCL before determining if your item fits into the parameters of that ECCN. If the ECCN contains a list under the “Items” heading, broken down into subparagraph(s) it is important to read these subparagraph(s) to determine if your item meets the technical specifications listed.

Read [Part 738](#) of the EAR for specific instructions on how to use the CCL. You can also access BIS [Introduction to Commerce Department Export Controls](#), which is an easy-to-follow guide that walks you through the classification process step-by-step.

### *Request an official classification from BIS.*

Submit a commodity classification request online through the [Simplified Network Application Process - Redesign \(SNAP-R\)](#). You must obtain a Company Identification Number (CIN) before accessing the online SNAP-R system and submitting your request.

## C. BIS CCL ECCN Classification Request Tips

If a commodity classification request is related to a previous classification by the Bureau of Industry and Security (BIS), please indicate the "CC"TS" (Commodity Classification Automated Tracking System) number of the previous classification. (This number begins with a, G).

Put this information in Block 24 of the SNAP-R Commodity Classification Work Item form. This should speed the processing time.

Identify the item to be classified by model or part number.

Note that most technology is controlled based on the resulting hardware. If your item’s “development,” “production,” or “use” data, it will be necessary to describe the related end-item hardware. Also, when describing the technology, address the [General Technology Note in supplement 2 to Part 774](#).



Review the Commerce Control List (Part 774 Supplement 1) to identify the ECCN or ECCNs that seem to be appropriate.

Try to describe your item/technology in the control parameters used in the CCL entries (you will find more information on the [Commerce Control List](#) on the Government Printing Office e-CFR website). Before BIS can confirm the classification of your item/technology, it will be necessary to compare the parameters of your item with the control list. If the parameter information is not provided with the application, the BIS will request that it be submitted prior to moving forward. Any delay in providing the information will delay the completion of your application.

Descriptive information (Brochures/pictures, etc) is often useful in classifying the product, this does not take the place of the information noted above.

Sales literature is often prepared for reasons other than classification. If the pictures, sales brochures, etc., do not cover all the relevant parameters, please supplement them with additional data necessary to complete the description. BIS must have information on all the relevant parameters contained in an ECCN to complete the classification of an item.

Classification requests must be limited to six items.

See [Part 748.3](#) of the Export Administration Regulations. The item requested must be described with a recommended classification - ECCN - in Block 22 of the SNAP-R Commodity Classification Work Item form. If there are multiple items, they should be individually listed in Block 22 (the Export Item Information sub-form). Select "Add Export Item" to add items 2-6. By entering "Export Items" individually, this allows the reviewer to classify each item. If multiple items are contained in a single Block 22 description, it is more difficult to tie the classification to the individual model numbers. If the number of items to be classified exceeds six, the additional items will not be classified unless you have received prior written approval from BIS.

Make sure that your submission substantiates that the item, technical data, or software is subject to the EAR.

See [Part 734.3](#). *BIS will only classify those items that are subject to the EAR.* If you are not sure that your item is subject to the EAR, you should try to resolve this question before making the submission to Commerce. See [Classification request guidelines](#).

Direct products of U.S. origin technical data.

See, [Part 734.3\(a\)\(4\)](#). Foreign products that have U.S. content ([Part 734.4](#)) may be subject to the EAR and are appropriate to classify. If such a classification is requested, it will be necessary to establish on what basis the item is subject to the EAR. Keep in mind that if such an item is in the United States it is subject to the EAR (see Part 734.3(a)(1)) despite any technical data or *de minimis* considerations.



If it is your intention to make the technical data or software "publicly available".

See, [Part 734.3\(b\)\(3\)](#). There is no need to request a classification as "publicly available" data or software is not subject to the EAR unless it is encryption software described in ECCN 5D002 (see, [Encryption](#) for more information). [Supplement 1 to part 734](#) provides additional guidance on "publicly available" criteria.

Other agencies such as the Departments of State and Energy, the Nuclear Regulatory Commission, and the Patent and Trademark Office have jurisdiction over certain items.

*BIS cannot classify those items. Consult Part 734.3(b) for more information.* If you have been informed by another agency that Commerce has jurisdiction over your item, please provide that information (such as a Commodity Jurisdiction number from State) in your application.

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*Note: You can also access BIS Guidelines to Reexport Publications to gain more insight into what information you should provide at the time of your request. Classification Request Guidelines Tips (Section 748.3 of the Export Administration Regulations).*

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What if my product is not listed?

After careful review of your item against the CCL, if you are convinced your item does not fit into the parameters of any ECCN, your item may be designated as EAR99, keeping in mind it is not controlled by [another agency](#). If this is the case, your item may be exported using the license exception NLR (No license requires, as long as all of the following criteria is met:

- The item is not being shipped to a [sanctioned destination](#)
- The item is not being shipped to a [denied person, sanctioned entity, or prohibited end-user](#)
- The item will not be used for a specific [end-use](#), subject to higher controls.

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*Note: For further details on these export restrictions, read Parts 736, 742, 744, and 746 of the EAR. If you still need guidance, you may contact the Outreach and Educational Services Division at (202-482-4811) or the Western Regional Office at (949-660-0144). While BIS can provide oral advice and guidance, they cannot give definitive classifications over the phone.*

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## 6. Harmonized Tariff Schedule (HTS) -U.S. import classification codes Schedule B numbers-U.S. export classification codes

### A. Harmonized Tariff Schedule (HTS) and Schedule B numerical classifications.

The first 6 digits of an HTS and Schedule B number will always be the same for a particular product. A key difference between the HTS and Schedule B 10-digit classification systems is the number of codes. There are approximately 19,000 HTS codes, compared to about 9,000 Schedule B codes. The additional detail for HTS classifications means multiple HTS numbers can correlate to a single Schedule B number.

The Harmonized Tariff Schedule of the United States (HTS) sets out the tariff rates and statistical categories for all merchandise imported to the United States and is a total of 10-digits in length. The United States International Trade Commission (USITC) manages and produces the HTS. The USITC has a search tool that is available for trade to use.

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<https://hts.usitc.gov/>

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### B. Harmonized Tariff Schedule (HTS) Nomenclature.

The HTS is based on the international Harmonized System, which is the global system of nomenclature applied to most world trade in goods. The Harmonized System (HS) is recognized by over 179 countries, customs, or economic unions, representing 98 percent of world trade. Therefore, the first six-digit codes are assigned that represent general categories of goods and known as the “international standard”.

### C. Harmonized Tariff Schedule (HTS) codes in exporting.

In most cases HTS codes can also be used for export filing. When used the first six digits of an HTS and Schedule B number will always be the same for a particular product. You will need to know the HS Code for your product. It’s always recommended to use Schedule B numbers when submitting AES/EEI. To know which HTS numbers cannot be used for export, see HTS codes that are not valid for Automated Export System on the Census Bureau’s Foreign Trade website. After you file (EEI) your export shipment with an HTS number, AES will convert the HTS number to a Schedule B number for statistical purposes. Allowing dual use of HTS codes can save filers time in completing required forms.

Alternatively, the Notice to Exporters found in the Harmonized Tariff Schedule at the U.S. International Trade Commission website lists the Schedule B numbers needed for export in place of HTS numbers.

## D. Schedule B Number for the United States

The United States uses a 10-digit code to classify products for export. The Schedule B code is a subset of HTS codes for U.S. Exporters. Schedule B codes are used for statistical purposes by the U.S. government to monitor U.S. exports. The Schedule B is administered by the U.S. Census Bureau's Foreign Trade Division. There is a Schedule B number for every physical product, from lipstick to tools. You must have the applicable HTS or Schedule B number to file for export, these numbers can be found in the schedule B Commodity Search Tool and Census Schedule B Search Engine URLs which are listed below.

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<https://uscensus.prod.3ceonline.com/https://www.census.gov/foreign-trade/schedules/b/index.html>

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Information about Schedule B classification.

For more information about Schedule B classification, visit

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[census.gov/scheduled](https://www.census.gov/scheduled)

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Additionally, you can contact the Micro Analysis Branch at 800-549-0595, option 2.

## E. The Product Classification Sheet

A Product Classification Sheet is a useful tool for documenting the results of product classifications. This Sheet may contain the following for each product: ECCN, Schedule B Number, export license symbol, and the countries for which an export license is needed based on “product classification / country” screening.

# 7. Export Licensing Decisions and Processes

## A. Laws Governing Export Controls.

The Export Administration Act (EAA) of 1979 as amended 50 U.S.C. app. §2401 - 2420 (EAA). EAA grants authority to various Federal agencies to regulate exports. The agencies in question include the United States Department of Commerce via the Bureau of Industry and Security and the U.S. Department of State via the Directorate of Defense Trade Controls. Generally, most licenses are BIS licenses. Waldom Electronics does not handle DDTC ITAR licensable commodities/products.

## B. Commercial-use and Dual-use items.

Commercial-use items and items that are considered dual-use (i.e., items that have a defense application but may be used in a commercial setting are considered dual-use if they are not specifically designed for the military), are governed by the Export Administration Regulations (EAR). The EAR 15 C.F.R. part 730 et seq. A critical component of the EAR is determining the

Company's Product's Export Control Classification Number (ECCN). ECCN numbers are derived from a matrix contained at 15 C.F.R. part 774 sup. 1.

## 8. Deemed Exports

The obligation to obtain an export license from BIS before “releasing” controlled technology to a foreign person is informally referred to as a deemed export. “Any release in the United States of “technology” or source code to a foreign person is a deemed export to the foreign person’s most recent country of citizenship or permanent residency.” (15 CFR 734.13(b))

Waldom Electronics does not provide Deemed Exports service.

## 9. Export Consolidated Screening

### A. Compliance with export control and economic sanctions laws.

Compliance with export control and economic sanctions laws is an integral part of the culture of our organization, with the potential for sizeable fines and associated reputational risks. It is therefore critical to implement robust processes and procedures to ensure compliance.

### B. Screening of parties to your shipment.

The screening is required of all parties to any export transaction against the U.S. proscribed party’s lists. There are many government agencies that require screening to be done prior to export from the USA. The government provides the trade with a Consolidated Screening List Search Engine therefore, unless a company has a high volume of export shipments this is a free service.

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<https://www.trade.gov/consolidated-screening-list>

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### C. Consolidated screening applications

There are many software providers in the marketplace that offer their own Consolidated Screening application. Waldom Electronics will be using the government application. International Trade Administration is the administrator of the electronic “Consolidated Screening List”.

### D. Prohibited Transactions

U.S. exporters who knowingly engage in Prohibited Transactions, whether directly or indirectly, or who do not otherwise take reasonable precautions (as part of an Export Control Compliance Program) to prevent their businesses from engaging in Prohibited Transactions may be construed as violating U.S. export control laws and be subject to civil and criminal enforcement by U.S. government export control agencies (i.e., DDTC, OFAC and/or the BIS).

### E. Consolidated Screening List Search Engine

The Consolidated Screening List (CSL) is a list of parties for which the United States Government maintains restrictions on certain exports, reexports, or transfers of items. The website offers “Tools” are links to the CSL search engine, downloadable CSL files, and the CSL

Application Programming Interface (API), all consisting of the consolidation of multiple export screening lists of the Departments of Commerce, State, and Treasury. The responsible export employee(s) submitting AES/EEI should be the person to train and begin using the new system for Screening.

#### F. Key sources

Department of Commerce – Bureau of Industry Security

- Unverified List
- Denied Persons List
- Entity List
- Military End User (MEU) List

Department of State – Directorate of Defense Trade Controls

- AECA Debarred List

Department of Treasury – Office of Foreign Assets Control

- Specially Designated Nationals List
- Foreign Sanctions Evaders List
- Sectoral Sanctions Identifications (SSI) List
- Correspondent Account or Payable – Through Account Sanctions (CAPTA) List
- Non-SDN Menu-Based Sanctions List (NS-MBS-List)
- Non-SDN Chinese Military-Industrial Complex Companies ((CMIC)
- Palestinian Legislative Council List

#### G. Education and Processes

Processes for handling questionable transactions.

Whether it is a potential screen hit, license determination concern or question, or the presence of a red flag or questionable transaction, it is critical to create a mechanism for stopping, holding, and releasing questionable transactions. These processes should be well established and known to all staff. The Quality and Compliance Director is responsible to have written guidance on the importance for all staff to be able to place a stop or hold on any questionable transaction and designate who has the authority to review and ultimately release or stop an export altogether.

Things to remember.

- *Screen each transaction / shipment immediately prior to export.*
- *If the system returns a hit-hold notice, the shipper must clarify and fix an error, if not possible then do not export and contact the Quality and Compliance Director and the appropriate government agency.*
- *If you fully process a hold and then proceed to ship from the U.S., the company and employee are in violation and are subject to fines, penalties and possible prevented from handling Exports.*

## 10. Transition Trade CCL Diversion Risk

The Office of Technology Evaluation (OTE) has had extensive collaboration with the US Trade to close the gaps that the exporting community encounters during their export processing. Both government (OTE, BIS, EAR) and the trade industry recognize that implementing an effective export compliance program is an important component of responsible corporate citizenship and good business practices to help prevent unlawful diversion of U.S. dual-use items and transactions subject to the EAR through transshipment trade with requirements for reporting in AES items that are controlled for export under the EAR. For companies to report EAR required information they need to determine if the items are subject to EAR controls. Among the check list of questions are:

- 1) What is the company exporting? (Including determining the Export Control Classification Number)?
- 2) Where is the item destined?
- 3) Who are the parties to the transaction?
- 4) How will the item be used?

### A. EAR §736.2(b)(10)

Section 736.2(b)(10) prohibits a person from exporting or re-exporting an item if the person has “knowledge” that a violation of the EAR or any license exception or any governmental order has occurred, or is about to occur, or is intended to occur in connection with the item.

If follow-up inquiries for more information from the customer do not satisfactorily resolve doubts, the order should be put on hold, and the Director of Quality and Compliance contacted. If suspicions remain after such inquiries, and there is still interest in pursuing the order, then an export license should be applied for or notification by the Director of Quality and Compliance to the appropriate U.S. enforcement agency.

In cases where Company personnel suspect that illegal activities may have taken place or are planned, and/or a person is asking them to participate in such activities, the Director of Quality and Compliance should be contacted immediately to discuss what further action needs to be taken, including bringing the matter to the attention of government export enforcement authorities.

### B. Shipment diversion risk best practices

Below are the best practices the government and the trade have recommended to do when encountering a shipment diversion risk:

1. Be alert to the Red Flag indicators and communicate any red flags to all divisions, branches, etc.
2. Exporters/Re-exporters should seek to utilize only those Trade Facilitators/Freight Forwarders that administer sound export management compliance programs.
3. Know the foreign customers by obtaining detailed information on the bona fides credentials of their customer to measure the risk diversion.
4. Avoid routed export transactions when exporting and facilitating the movement of dual-use items unless a long standing and trustworthy relationship has been built

- among the exporter, FPPI (Foreign Principal Party of Interest), and the freight forwarders (US agent).
5. When the Destination Control Statement (DCS) is required, the Exporter should provide the appropriate ECCN and the end destination where the items are intended to be used, for each export to the end user and, where relevant to the ultimate consignee.
  6. For exports that do not require the DCS, other classification information (EAR99) and the end destination should be communicated on bills of lading, air waybills, buyer/seller contracts and other commercial documentation.
  7. The Exporter/Re-exporter (USPPI) should provide the ECCN or the EAR99 classifications to freight forwarders (agents) and should report in AES the ECCN or the EAR99 classifications for all export transactions, including “No License Required” (NLR) designation certifying that no license is required.
  8. Know your customers use information technology i.e., websites to the maximum extent feasible to augment other due-diligence measures in combating the threats of diversion. We want the item to reach an authorized end user for authorized end uses.

## 11. ANTI-BOYCOTT

### A. General

The anti-boycott laws are a set of EAR regulations that essentially prohibit U.S. companies from complying with aspects of other countries’ boycotts that the U.S. does not support. Boycott is another name for export controls or embargoes administered by other countries. The policy is implemented through the anti-boycott provisions of the Export Administration Act (15 CFR Part 760) – enforced by the U.S. Department of Commerce – and through a 1977 amendment to the Tax Reform Act of 1976- enforced by the U.S. Treasury. The laws are written to discourage US companies and their foreign branches, subsidiaries, and affiliates from participating in other countries boycotts that the United States does not endorse. It applies to US and non-US companies – companies can face potentially significant civil and criminal penalties, imprisonment, general denial of export privileges and exclusion from practice.

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*Note: Waldom Electronics has implemented the electronic consolidated screening process.*

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### Bureau of Industry (BIS)

The Bureau of Industry website is an excellent resource to use when additional information is needed and is not included in this manual.

<https://www.bis.doc.gov/index.php/enforcement/oac>

## Prohibited actions by U.S. persons.

U.S. persons are prohibited from taking certain actions with the intent to comply with, further, or support an unsolicited foreign boycott. Prohibitions include:

- Refusing to do business with a boycotted or blacklisted entity.
- Discriminating against, or agreeing to discriminate against, any U.S. person on the basis of race, religion, sex, or national origin.
- Furnishing information about business relationships with a boycotted country or a blacklisted entity.
- A boycott-related refusal, or agreement to refuse to do business, or request that others refuse to do business with a boycotted country (e.g., refusing to do business with Israel to avoid being “blacklisted” by Iran or to obtain business in Iran).
- Furnishing information about business relationships with boycotted countries or blacklisted persons (e.g., certifying that your company has no representative in Israel as part of a condition of doing business in the United Arab Emirates, where the request for such certification is known to be boycott-related).
- Implementing a letter of credit containing prohibited boycott language or conditions (e.g., a provision certifying that the company does not do business with Israel).
- Any document – e.g., commercial invoice, bill of lading, receipt, packing slip, shippers’ letter of instruction – that states any of the above is prohibited and Waldom Electronics should not export.

### B. Countries Boycotted by the United States

Iraq	Libya	Syria
Kuwait	Saudi Arabia	Yemen
Lebanon	Qatar	

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*Note: that the U.S. anti-boycott laws are not limited to violations by the above-listed “boycotting countries.” In addition, Israel is not always the targeted or boycotted country.*

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### C. Boycott Alert

When a Boycott is of concern the employee, based on the above information, will bring it immediately to their managers’ attention. The manager will review the information and decide whether it could be a violation or, if more information is needed, shall seek the service of OAC and/or BIS.



#### D. Anti-Boycott EAR and Department of Treasury Reports Are Required

Export personnel should also keep in mind that U.S. export laws and tax laws differ as to what specific actions or conduct are reportable/non-reportable and prohibited/permissible. Compliance is required with both export-related and tax-related anti-boycott laws/regulations.

##### EAR Reporting Requirements

The antiboycott provisions of the EAR require U.S. persons to report quarterly requests they have received to take certain actions to comply with, further, or support an unsanctioned foreign boycott.

Section 760.5 of the EAR requires U.S. persons to report their receipt of boycott requests. Reports may be filed electronically or by mail on form BIS 621-P for single transactions or on form BIS 6051P for multiple transactions involving boycott requests received in the same calendar quarter. U.S. persons located in the U.S. must postmark or electronically date stamp their reports by the last day of the month following the calendar quarter in which the underlying request was received.

##### Treasury Reporting Requirements

U.S. tax laws also include provisions relating to international boycotts of Israel (see 26 U.S.C. § 999) and other countries/principalities. These laws include reporting requirements for U.S. companies and their related (more than 50% owned) companies, both non-U.S. as well as U.S., having “operations” in, with, or related to boycotting countries and their nationals (“operations” is defined quite broadly and includes sales). Reports must be made to the U.S. Department of the Treasury on those operations and on any participation in, or cooperation with, an international boycott or any request for such participation or cooperation. The U.S. levies large legal and tax penalties if a U.S. (or U.S.-owned) company participates in or cooperates with an illegal boycott; it also denies tax credits if such companies engage in commercial activity with a “sanctioned country”.

#### E. Anti-Boycott Voluntary Self-Disclosures

U.S. persons may voluntarily disclose violations of the antiboycott provisions of the EAR in accordance with the procedures set forth in Section 764.8 of the EAR. If you believe you may have violated the antiboycott provisions of the EAR, BIS urges you to file a voluntary self-disclosure (VSD). Filers should ensure that they comply with the requirements of Section 764.8 regarding the timing of filing, the contents of the initial notification of a VSD, the subsequent narrative account of the violation(s), and certification of any representations made in connection with the VSD. The provision also describes supporting documentation that should accompany a VSD filing. After receipt of the disclosure and any supporting documentation, and thorough review and investigation, OAC will inform the party filing the disclosure of any action it intends to take.

The criteria BIS uses in determining whether to pursue an enforcement action and what sanctions it will recommend are described in Supplement 2 of part 766. As indicated in Supplement 2, BIS encourages VSDs by giving the disclosing party “great weight” mitigation in the assessment of penalties.

##### Submission of voluntary Anti-boycott self-disclosures

Submit to:

Office of Antiboycott Compliance  
1401 Constitution Avenue, NW, Room 6098, Washington, DC 20230  
Tel: (202) 482-2381

For more information, contact:

U.S. Department of Commerce  
BIS/Office of Antiboycott Compliance  
1401 Constitution Avenue, NW, Room 6098, Washington, DC 20230

Antiboycott Advice Line:

Phone: (202) 482-2381

or by [email](#) to

<https://www.bis.doc.gov/index.php/component/rsform/form/23?task=forms.edit>

## 12. U.S. Embargoed Countries: Cuba, Iran, North Korea, Syria, Ukraine-Crimea Region

### A. Export Controlled or Embargoed Countries, Entities, and Persons.

To accomplish U.S. foreign policy and national security goals, the Department of the Treasury's Office of Foreign Assets Controls (OFAC) administers economic sanctions programs and embargoes for several countries. An embargo is an official ban by a government on trade or other commercial activity with a particular country or the exchange of specific goods. Embargoes deal with trade-related activity, while sanctions, which are like embargoes, are used for all other disciplines of prohibitions. U.S. export regulations restrict imports and exports to certain destinations without a U.S. Government Authorization (called "License"). Embargoes of the countries listed above the U.S. prohibit all transactions without a license authorization.

Screening potential exports to embargoed or "of concern" countries.

Potential exports to countries that are embargoed or "of concern" must be screened more carefully than others because of the strict controls imposed on those countries, particularly by the U.S. Government and by policies of the Company and its subsidiaries. Certain regulations of the U.S. Government apply to both U.S. and non-U.S. transactions - because those regulations control 1) goods and technology of U.S.-origin and 2) activities of "U.S. persons" - wherever those goods/technology/U.S. persons are located.

### Specific Countries

Accordingly, with certain minor exceptions, all Waldom Electronics affiliates must comply with the following relative to:

- **Cuba** - No sales or shipments, direct or indirect, may be made by **any** Waldom Electronics affiliate, U.S., or non-U.S.
- **Iran, North Korea, Syria, and Ukraine Crimea Region** - No sales or shipments, direct or indirect, may be made by **any** U.S. Waldom Electronics affiliate without the express written approval of the Director of Quality and Compliance.

## 13. Sanctioned Countries

Note: OFAC administers several different sanctions programs. The sanctions can be either comprehensive or selective, using the blocking of assets and trade restrictions to accomplish foreign policy and national security goals. The countries are listed on OFAC web site:

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<https://ofac.treasury.gov/sanctions-programs-and-country-information>

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NOTE: The Consolidated screening tool that is used should alert the user to possible candidates that appear on the embargo or sanctions list regardless, the user must first verify if it is the same party, etc. If it is a match don't ship without an authorized license from BIS or OFAC.

## 14. Enhanced Proliferation Control (EPCI)

The end use of U.S. products for direct/indirect use in any nuclear/missile technology, chemical or biological application maybe controlled by U.S. export regulations and should be reviewed prior to any sale.

Commodities, software, and technical data may not be used directly or indirectly in the design, development, fabrication or use of nuclear, chemical or biological weapons or missile technology.

The Commerce Control List is located [15 CFR Part 744](#)

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<https://www.ecfr.gov/current/title-15/part-774>

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## 15. U.S. Export Documents

In addition to thoroughly screening each transaction, exporters need to make sure that proper export documents are utilized and completed correctly. The discussion below focuses on the Automated Export System (AES, a key identification regarding Census data for U.S. exports and the Destination Control Statement which is required on certain U.S. export documents.

Additional information on U.S. export documents is available in 15 CFR Part 758 - Export Clearance Requirements - of the Commerce and Foreign Trade.

### A. Automated Export System (AES) – Electronic Export Information (EEI)

The electronic declaration equivalent of a **Shippers Export Document (SED Form 7525-V, Form 2525-V-Alt)** or **Shippers Letter of Instruction (SLI)** is now an **Automated Export System (AES)** record which is the **Electronic Export Information (EEI) transmission via AES**. AES/EEI filings are intended to improve accuracy of data, allow more “real- time” government monitoring of export compliance, and reduce use of paper. Every shipment that departs the United States must either have an AES ITN number or an AES Exemption Citation. This information must be given to the exporting carrier so they may note it in their system. The exemptions do not apply

to any shipment/transaction requiring a license. All AES or AES exemption must be filed in the United States.

An AES filing is required for any of the following exports from the U.S.: 1) a shipment which requires an export license, 2) a shipment where a single commodity is over \$2,500. or 3) a shipment from US moving through Canada to a foreign destination Note that the same AES/EEI requirements apply to export shipments by USPS.

In general, only the exporter known as the US Principal Party of Interest (USPPI) or the exporter's agent known as a Freight Forwarder may complete an AES/EEI filing. AES transactions must be transmitted from the United States by these parties. Thus a U.S. manufacturer who is also the exporter (and thus as the party in the U.S. who receives the principal benefit of the export transaction is termed the "U.S. Principal Party in Interest" (USPPI)) and can file an AES/EEI. As mentioned, a U.S. freight forwarder can also do so if acting as the authorize agent for the USPPI. The forwarder as agent must, however, have written authorization such as a "power of attorney" from the USPPI to file EEI on USPPI's behalf.

The exception to the above is a "routed export transaction". An AES or AES exemption must be filed in the United States. That is one in which a non-U.S. "foreign principal party in interest" (FPPI), typically the buyer at destination, authorizes his/her own U.S. freight forwarder acting as agent in writing (as by a FPPI power of attorney) to act on their behalf to facilitate export of items from the U.S as their agent. In that case the U.S. manufacturer may have no relationship with the chosen freight forwarder but is responsible to provide the USPPI in the U.S. all the detail necessary to file the EEI.

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[\*AESDirect-User-Guide.pdf\*](#)

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Waldom Electronics files and submits their own AES EEI via AES Direct. The source document (best practice) that should be used for gathering all the EEI information is an SLI (Shippers Letter of Instruction) or commercial invoice. Waldom Electronics is the most familiar with their products and has control of their exports. The USPPI is always responsible for any AES errors.

If an agent is transmitting EEI for the USPPI the agent is responsible for typos made by that party.

#### **B. Destination Control Statement (15 CFR 758.6)**

Requirement for the Destination Control Statement

- The exporter must incorporate the following information as an integral part of the commercial invoice whenever items on the Commerce Control List are shipped (i.e., exported in tangible form), unless the shipment (i.e., the tangible export) may be made under License Exception BAG or GFT (see part 740 of the EAR) or the item is designated as EAR99. (15 CFR 758.6(a).
- The statement must read as follows:

“These items are controlled by the U.S. Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the U.S. government or as otherwise authorized by U.S. law and regulations.” (15 CFR 758.6(1))

- The term “authorized” includes exports, reexports and transfers (in-country) designated under No License Required (NLR)
- The ECCN(s) for any 9x515 or “600 series” “items being shipped (i.e., exported in tangible form. (15 CFR 758.6(2)).

### C. Third Party Logistics Partners and Freight Forwarders

As company policy Waldom Electronics will require all logistics vendors, except for UPS, Federal Express and DHL Express, to sign the “Letter of Engagement” indicating compliance with AMI requirements prior to initiation of any service. See Appendix F.

## 16. RECORD KEEPING

The Export Administration Regulations (EAR) and regulations of other participating government agencies responsible for exports require the USPPPI to maintain complete and accurate records relating to all export transactions. They may be retained in paper or electronic format. The Export Control Manager or designate is responsible for maintaining files containing such export records as shown below.

### A. Records to be Maintained – Five-year retention period (15 CFR 762.6)

AES/Export records are to be retained for five (5) years from the date of the export, re-export, or any other termination of the transaction. The records to be maintained in connection with each U.S. export (including re-exports) transaction should include any written material relating to the export - such as export applications, licenses, end-use statements, import certificates, commercial invoices, shipper letter of instruction, air/ocean waybills, purchase orders, sales orders/contracts, invoices, receipts, letters of credit, memos/notes, telephone logs, and any correspondence, copy of the EEI, AES response message.

Destruction or disposal of records. If BIS or any other PGA makes a formal or informal request for certain record or records, such record or records may not be destroyed or disposed of without the written authorization of said agency concerned. These records must be kept in a secure area until actual destruction occurs. The prohibition applies to records pertaining to BIS voluntary disclosures in accordance with 15 CFR 764.5(c)(4)(ii) and other records even if such records have been retained for a period exceeding that required by paragraph (a) of 15 CFR 764.5.

### B. Location of Records

The Director of Global Logistics and trade Compliance or appointed designate is responsible for ensuring that its export records are properly maintained. Records related to ongoing transactions should be in a secure area on-site in an appropriate location. All export records should be in good

order and readily available to be retrievable at any time. All records stored off-site should be retrievable within a reasonable time – such as no more than 48 hours.

### C. Confidentiality of Electronic Export Information 15 CFR 30.60

EEI information is confidential, to be used solely for official purposes as authorized by the Secretary of Commerce. The Census Bureau uses this information for statistical information. There are some federal agencies that have official business have the legal authorization to use the information i.e., Department of State, Immigration and Customs Enforcement, and CBP for export control. Other agencies i.e., Economic Analysis, Bureau of Labor Statistics, and Bureau of Transportation Statistics for Statistical purposes. Absent such authorization, information collected pursuant to 15 CFR 30.60 shall not be disclosed to anyone by any officer, employee, contractor, agent of the federal government or other parties with access to the EEI other than to the USPPI or the authorized agent of the USPPI. The report of the EEI submitted to the US government shall not be disclosed by the USPPI or representative of the USPPI, agent for “nonofficial purposes”.

Any request for records by government export officials, or any visits or other contacts received from such officials, must be reported immediately to the Director of Quality and Compliance, or appointed designate.

Waldom Electronics Export Manager or designate will manage the confidentiality of Export information in accordance with the law.

## 17. GOVERNMENT VISITS AND INQUIRIES

Agents of BIS Office of Export Enforcement, U.S. Customs and Border Protection (CBP) make visits to companies (sometimes without prior notice). It is important that Waldom Electronics personnel handle such visits appropriately. Make sure you always ask for photo IDs and require visitors to sign in using the Waldom Electronics visitor’s log. Contact the Director of Operations and if not present the Director of Quality once. If the person has no photo ID for verification – do not let them tour the facility.

While it is difficult to anticipate how a particular visit will proceed, some guidelines are useful for interacting with them. For example, because only Waldom Electronics personnel who are knowledgeable on export compliance matters should interact with government export officials, the receptionist at each facility should know to direct any government official regarding export law/regulations to the Director of Operations and if not present the Director of Quality or designate. The Director of Operations and if not present the Director of Quality or designate should be included in any meeting with government officials even if initial contact is with upper management. There should always be two (2) individuals from the Company in attendance.

All export documents provided to Government entities (the agencies that have the legal authorization) should have and an extra copy made and retained to reflect what was provided, in addition, they should include the date and the signature and information of the receiving party. Always request the government provide documentation detailing their request for information.

## A. Voluntary Self-Disclosures of Potential Violations

In 2023, there have been a series of changes in the relationship to VSD for multiple government agencies. These agencies are the Department of Commerce, Department of the Treasury and Department of Justice Tri-Seal Compliance

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*Note. In addition, changes to the VSD in general can be found in the following website: [www.bis.doc.gov](http://www.bis.doc.gov)*

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The sections to pay close attention to are embedded in this site and must be read to learn more about VSD and what to do. Remember, any infraction is not eligible for VSD if the government has notified you of the problem first either by issuing violation or a warning letter.

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*On the BIS website, there are Enforcement Policy Memos which must be read: <https://www.bis.doc.gov/index.php/all-articles/enforcement/2055-enforcement-policy-memo>*

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This section contains recent government agency memos covering:

- Addressing Foreign Government Prevention of End Use Checks
- Antiboycott Policy Memo
- Strengthening Antiboycott Reporting and Compliance Memorandum
- Academic Outreach Initiative Policy Memo
- Administrative Enforcement memo
- Voluntary Self-Disclosures and Disclosures Concerning Others

Pursuant to CFR Part 764.5 of the EAR, one copy of the information constituting a VSD or any other correspondence pertaining to a VSD may be submitted to:

Director, Office of Export Enforcement  
1401 Constitution Ave.  
Room H4514  
Washington, DC 20230  
Tel (202) 482-5036  
Facsimile: (202) 482 5889

## B. Enforcement Policy Memos Hiring Foreign Nationals

Human Resources in conjunction with the Director of Global Logistics and Trade Compliance will coordinate with the Project Managers to determine if the “non-permanent resident” selected complies with EAR regulations found at CFR parts 770-774. Waldom Electronics to determine the proper visa category and complete form I-129 and submit it to the Department of Commerce or State prior to the hiring of said individual. If the foreign national can be hired under a “license



exception,” completion of Waldom Electronics nondisclosure statement and/or Letter of Assurance would be required. If it is determined that the is required, the Director of Global Logistics and Trade Compliance will submit all documents to the Department of Commerce or Department of State. Human Resources will notify the appropriate Manager not to allow the foreign national to commence work on the “controlled” products at Waldom Electronics until approval has been issued. All Waldom Electronics employees, including all foreign nationals, are required to complete the orientation and new hire SOP.

### Foreign Persons

No Foreign Person will be given access to classified or export-controlled technology on any project or program that involves the disclosure of technical data as defined in the ITAR or EAR until that individual's license authority has been approved by DDTC, BIS, and Waldom Electronics Control & Compliance Office.

Waldom Electronics employees who have supervisory responsibilities for Foreign Persons must receive an export control/licensing briefing that addresses relevant EAR requirements as they pertain to classified and export controlled unclassified information.

#### *Foreign Person Training and Introduction to Waldom Electronics.*

Foreign Persons employed by or assigned to (in an extended visit type arrangement) Waldom Electronics shall receive a briefing that addresses the following items:

Prior to release of export controlled unclassified information to a Foreign Person, an export authorization issued by DDTC or BIS needs to be obtained by Waldom Electronics. Adherence to Waldom Electronics

security rules, policies and procedures and in-plant regulations.

Outline of the specific information that has been authorized for release to them.

### C. Plant Visits

Anyone sponsoring a plant visit, training etc. that will include foreign nationals must notify the Director of Global Logistics and Trade Compliance and the Director of Quality prior to the visit. The Director of Quality will complete and maintain a Foreign Visitor Briefing Statement (Appendix I), indicating that the appropriate compliance check has been conducted (license exception eligibility and RPL screening was completed).

### D. VISA Sponsor Letters

Waldom Electronics welcomes all foreign national visitors and encourages international exchange but must ensure that all appropriate safeguards are in place to protect the security of the Company and the export compliance program prior to issuing any sponsor letters. All sponsor letters should be:

- Person specific (e.g. name, date of birth, place of birth, and passport number).
- Site specific (e.g. the office being visited).
- Date specific (critical- sponsor letters should never be open-ended).
- Clear about the purpose of the visit.



It is important to keep track of foreign national visits because there are export related issues dealing with access to “technical data”. All foreign national visitors must sign the visitor’s log prior to entering a facility. Copies of all sponsor letters MUST be sent to the Director of Global Logistics and Trade Compliance and the Director of Quality. Any deviation from either the visa or sponsor letter requires immediate notification to the Director of Global Logistics and Trade Compliance, and the Director of Quality.

#### E. Transmission of Company Proprietary Technical Data

Transmission of Company proprietary technical data internationally is deemed an export and therefore is subject to the “Export Laws” of the U.S. Prior to distributing such information in any of the modes described below, the compliance review checks are to be conducted by the Regional Logistics and Trade Compliance Coordinator, if unavailable contact the Director of Global Logistics and Trade Compliance or Director of Quality.

##### Modes of Distribution

- Courier of documents
- Electronic transmission (memo to file by party transmitting information)
- Mailings
- Hand carries

##### Compliance Review Checks:

- Determine license-ability to end destination (license exception vs. validated license)
- End User check against the latest Restricted Party List (RPL) via Visual Compliance, AMI’s third party screening software

#### F. Visiting Foreign Countries

The following is the procedure to be implemented for all hand-carries of Waldom Electronics manufactured/owned products or other Waldom Electronics property exported from the U.S.

The purpose is to provide export procedures and guidelines relative to Export Controls and record-keeping requirements for the hand-carry of U.S. origin commodities or U.S. controlled products internationally; (products, technical data). These procedures and guidelines ensure that all transactions are made in compliance with the EAR. Waldom Electronics employees or visitors wishing to hand-carry for export purposes any commodities or technical data must first notify the Regional Logistics and Trade Compliance Coordinator. The following information must be provided:

- Product/Technology to be hand-carried (generic technical description).
- Value of hand-carry items.
- Country of origin of commodities.
- The usage of hand-carried commodities.
- Date of departure.
- Name of carrier.

- Port of export.
- Destination country.
- Entity or person who will have custody of the product.
- Will products be returned?
- When will they be returned?

Waldom Electronics maintains a Technology Control plan that is applicable to all facilities (located in the U.S. and Foreign Jurisdictions) and all employees must adhere to the plan when sponsoring foreign visitors or foreign Nationals visit a plant or when transferring technical data to foreign Nationals.

#### G. Badges

Waldom Electronics will provide each Visitor with a badge to be always worn while on Waldom Electronics premises. When the Visitor departs the facility they are to turn their badge in to the front desk/Human Resources.

Additionally, Foreign Nationals, Contractors and Visitors will sign the Visitor log and will also be issued a badge. They will always remain with a Waldom employee and access to certain areas of the premises may be denied. The badges are to be turned in to the company at the same time they sign out the visitor log. Foreign Nationals will be required to complete additional documentation.

## 18. TRAINING AND EDUCATION

Training of personnel is recognized as an on-going responsibility of Waldom Electronics, therefore, there will be a continuing program for informing and educating employees regarding the applicable regulations, limits and restrictions of the Export Administration Regulations and other related U.S. export regulations.

The Director of Quality and Compliance is responsible for identifying and determining the method, type, and frequency of training required for individuals that are involved in international transactions. This will be determined based on changes to the export regulations and/or the policy and procedures within the Company.

All training of an employee must be logged: Name, Title, Date, Type of Training, Online/In person, score and kept in the employee training file.

#### A. Training

The two methods that will be utilized to train employees is Formal and Continuous Training

- Formal Training - Structured meetings with agendas and handouts. A scribe is required to take notes and have an action plan. A copy of the handouts will be filed in the Internal Training File maintained by the Waldom Electronics Trade Compliance Team. The Waldom Electronics Regional Logistics and Trade Compliance Coordinator will maintain a “Training Attendance Log” (Appendix B)

- Continuous Training – As needed on-going verbal and written communication (electronic mail messages or memoranda) with personnel in export related departments. A copy of written communications will be maintained in the office of the Waldom Electronics Director of Global Logistics and Trade Compliance or their designee.

## B. Training Materials

The following sources may be used to keep abreast of the constantly changing export environment:

- Waldom Electronics Export Control Manual
- Company SOPs
- Regulatory News Alerts, Internet
- Outside Consultant
- BIS email updates
- BIS, and other Export Compliance related workshops and seminars – internal/external – virtual/face-face and a series of videos

An example of the on-going BIS Seminars and Training can be found at:

<https://www.bis.doc.gov/index.php/compliance-a-training>

## C. Types of Training

Training will be provided to employees involved in export related departments:

Always begin with the “buddy system” – one employee checks the AES of the other employee work for inaccuracies and/or errors, and vice-versa.

- Identify errors made and review in a group on how it happened and what can be done to prevent it from happening again.
- Have employees identify items that need more explanation than what is in the manual.
- Select sections of the manual to develop SOP for your section and/or department.
- Seminars for those who are involved in exporting.

## D. Orientation

The Director of Global Logistics and Trade Compliance will ensure (either directly or through a delegate) orientation training is provided to all new employees involved with export activities, as applicable. The training will include, but will not be limited to, the following topics:

- Summary of the organizational structure of export related departments and functions
- Company commitment to export compliance
- U.S. Export Regulations as they relate to the specific position of the employees.
- Waldom Electronics Export Compliance Policy
- Waldom Electronics Export Compliance Manual
- AES Direct

- Documentation used for exports, i.e., commercial invoice, packing list, shipper letter of instruction AES receipt record.

#### E. Update Sessions

The Director of Global Logistics and Trade Compliance or his delegate will provide formal and informal update sessions to meet the specific needs of the individuals and/or operating departments. The purpose of the training will be to reinforce knowledge and to communicate updates and changes to the export regulations and company procedures. The training will include but will not be limited to the following subjects, depending on the audience:

- Overview of the scope of export controls.
- Review of Product Matrix (commodity restrictions).
- Review of systems currently in place to ensure compliance.
- Requirements of license exceptions.
- Recordkeeping requirements.
- Export documentation preparation.
- Shipper Letter of Instruction.
- AES Direct.
- Export compliance program at Waldom.

#### F. Outside Seminars

From time-to-time, employees dealing in international activities will attend seminars offered by the Department of Commerce, Department of State, BIS, CBP or private organizations, and industry groups. These seminars are to present awareness of changes in the regulations and to keep the employees current on export-related issues.

#### G. Executive Awareness

An Executive Awareness Session will be presented to senior management to keep them abreast of relevant export-related issues on a quarterly basis if warranted.

## 19. EXPORT DEALERS AND REPRESENTATIVES

Waldom Electronics works with independent resellers (foreign distributors and dealers). These entities are required to sign a written form that explains their responsibility and agreement to comply with U.S. law. See Resellers Compliance Agreement— Appendix F

## APPENDIX A – CERTIFICATE OF UNDERSTANDING – WALDOM ELECTRONICS

This certifies that I have received the Waldom Electronics CEO “Statement of Regulatory Compliance Commitment”.

I further understand that it is my responsibility to comply with this “statement” and the applicable policies/procedures at all times. If a situation arises with the procedures in the “export compliance manual where I have questions on how to resolve, I will contact the Regional Logistics and Trade Compliance Coordinator for resolution.

Name Printed : \_\_\_\_\_

Signature : \_\_\_\_\_

Date : \_\_\_\_\_

# APPENDIX B – TRAINING ATTENDANCE LOG – WALDOM ELECTRONICS

Date	Subject	Attendee	Type
____/____/____			<input type="checkbox"/> Orientation
____/____/____			<input type="checkbox"/> Update
____/____/____			<input type="checkbox"/> Seminar
____/____/____			<input type="checkbox"/> Orientation
____/____/____			<input type="checkbox"/> Update
____/____/____			<input type="checkbox"/> Seminar
____/____/____			<input type="checkbox"/> Orientation
____/____/____			<input type="checkbox"/> Update
____/____/____			<input type="checkbox"/> Seminar
____/____/____			<input type="checkbox"/> Orientation
____/____/____			<input type="checkbox"/> Update
____/____/____			<input type="checkbox"/> Seminar

## APPENDIX C – EXPORT COMPLIANCE CONTACTS – WALDOM ELECTRONICS

### US Export Compliance Contacts:

Name	Title	Phone Contacts	Email address
Nick Molck	Logistics and Trade Compliance Coordinator	Office: 815.490.4208 Mobile: 815.814.2815	Nick.Molk@waldom.com
Dave Tenorio	Director of Global Logistics and Trade Compliance	Office: 937.483.5211 Mobile: 919.749.3380	David.Tenorio@waldom.com
Paul Pleban	Director of Operations	Office: 815.490.4364 Mobile: 440.506.5827	Paul.Pleban@Waldom.com
Dan Heinen	Director of Quality	Office: 815.490.4212 Mobile: 815.222.6204	dan@waldom.com

## APPENDIX D – PLANT / SITE VISIT CONTACTS

### Plant / Site Visit Contacts

<b>Name</b>	<b>Title</b>	<b>Phone Contacts</b>	<b>Email address</b>
Paul Pleban	Director of Operations	Office: 815.490.4364 Mobile: 440.506.5827	<a href="mailto:Paul.Pleban@waldom.com">Paul.Pleban@waldom.com</a>
Dan Heinen	Director of quality	Office: 815.490.4212 Mobile: 815.222.6204	<a href="mailto:Dan@waldom.com">Dan@waldom.com</a>
Nick Molck	Logistics and Trade Compliance Coordinator	Office: 815.490.4208 Mobile: 815.814.2815	<a href="mailto:Nick.Molck@waldom.com">Nick.Molck@waldom.com</a>
Dave Tenorio	Director of Global Logistics and Trade Compliance	Office: 937.483.5211 Mobile: 919.749.3380	<a href="mailto:David.Tenorio@waldom.com">David.Tenorio@waldom.com</a>
Anita Countryman	Manager of Human Resources	Office: 815.490.4356	<a href="mailto:Anita.Countryman@waldom.com">Anita.Countryman@waldom.com</a>



## APPENDIX E - COUNTRY GROUP COMMERCE CHART

### COUNTRY GROUP - SUPPLEMENT #1 PART 738 OF THE EAR

(current through January 2024. Review and update to maintain a current list).

Country	[D:1] National Security	[D:2] Nuclear	[D:3] Chemical & Biological	[D:4] Missile Technology
Afghanistan			X	
Armenia	X		X	
Azerbaijan	X		X	
Bahrain			X	X
Belarus	X		X	
Burma	X		X	
Cambodia	X			
China (PRC)	X		X	X
Cuba		X	X	
Egypt			X	X
Georgia	X		X	
Iran		X	X	X
Iraq	X	X	X	X
Israel		X	X	X
Jordan			X	X
Kazakhstan	X		X	
Korea, North	X	X	X	X
Kuwait			X	X
Kyrgyzstan	X		X	
Laos	X			

<b>Country</b>	<b>[D:1] National Security</b>	<b>[D:2] Nuclear</b>	<b>[D:3] Chemical &amp; Biological</b>	<b>[D:4] Missile Technology</b>
Lebanon			X	X
Libya	X	X	X	X
Macau	X		X	X
Moldova	X		X	
Mongolia	X		X	
Oman			X	X
Pakistan		X	X	X
Qatar			X	X
Russia	X		X	
Saudi Arabia			X	X
Syria			X	X
Taiwan			X	
Tajikistan	X		X	
Turkmenistan	X		X	
Ukraine	X			
United Arab Emirates			X	X
Uzbekistan	X		X	
Vietnam	X		X	
Yemen			X	X

### Country Group E

<b>Country</b>	<b>[E:1] Terrorist supporting countries<sup>2</sup></b>	<b>[E:2] Unilateral embargo</b>
Cuba	X	X
Iran	X	
Korea, North	X	
Sudan	X	
Syria	X	

## APPENDIX F - FREIGHT FORWARDERS LETTER OF ENGAGEMENT

[Forwarder Company Name & Address]

### **Re: Acknowledgement of WALDOM ELECTRONICS. Export Compliance Policy**

Dear [Freight Forwarder]:

WALDOM ELECTRONICS. is presenting this “compliance letter of engagement” to restate and secure your acknowledgment of and commitment to some of the requirements of our business relationship. These requirements are an integral part of the corporate policy of WALDOM ELECTRONICS., which, as a U.S.-based company, must comply fully with all U.S. laws governing international business activities, including:

- The U.S. Export Administration Regulations (“EAR”) maintained by the U.S. Department of Commerce.
- The U.S. International Traffic in Arms Regulations (“ITAR”) maintained by the U.S. Department of State.
- Trade and economic sanctions maintained by the U.S. Treasury Department’s Office of Foreign Assets Control (“OFAC”)
- the Federal Trade Regulations (“FTR”) maintained by the U.S. Department of Commerce, Bureau of the Census.

We greatly appreciate [Freight Forwarder]’s cooperation regarding compliance with all applicable laws and regulations. While it is [Freight Forwarder]’s obligation to ensure its own compliance with the laws and regulations referenced in this letter, it shall also be the ASTRO- MED, INC.’s obligation to ensure its own compliance with the laws and regulations referenced in this letter. We are providing information on the U.S. rules as a courtesy to [Freight Forwarder] and to ensure that [Freight Forwarder] is on notice regarding these compliance obligations. Accordingly, we ask that [Freight Forwarder] acknowledge the following:

1. [Freight Forwarder] shall ensure that the appropriate destination control statement appears on export documentation prepared by [Freight Forwarder] when applicable and required.
2. [Freight Forwarder] shall notify WALDOM ELECTRONICS’s Regional Logistics and Trade Compliance Coordinator promptly if any contradiction, inconsistency, incompleteness or inaccuracy regarding WALDOM ELECTRONICS.’s export documentation or instructions is identified and shall place the shipment on hold until the export documentation is perfected. [Freight Forwarder] shall not make any changes to or substitutions for any WALDOM ELECTRONICS. export documentation OR AES entry data without prior approval from WALDOM ELECTRONICS’s Regional Logistics and Trade Compliance Coordinator.

3. [Freight Forwarder] shall return completed copies of the airway bill and proof of AES submission within a reasonable time of export; upon request from Client's NAME; provide us with a copy of the AES entry.

4. [Freight Forwarder] shall comply with all applicable terms of U.S. Government export licenses and authorizations governing any WALDOM ELECTRONICS. export transaction.

5. [Freight Forwarder] shall indemnify WALDOM ELECTRONICS. against any costs or penalties assessed against WALDOM ELECTRONICS. which result directly from [Freight Forwarder]'s non-compliance with applicable laws. [Freight Forwarder] will not be liable for any costs or penalties which result solely from the acts or omissions of WALDOM ELECTRONICS.

We appreciate your adherence to these commitments, which are an integral part of WALDOM ELECTRONICS.'s corporate policy. We request that you return to us your signed acknowledgment, and we invite you to contact us if you have any questions concerning this letter, WALDOM ELECTRONICS.'s policies or the laws and regulations referenced in this letter.

Yours Sincerely,

David Tenorio  
Director, Global Logistics and Trade Compliance  
Waldom Electronics

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Acknowledged by:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDIX G - RESELLERS COMPLIANCE AGREEMENT

(Date)

(Name of Reseller)

Subject: **U.S. Re-Export Regulatory Compliance**

We at (WALDOM ELECTRONICS.) are pleased to have you as a distributor/reseller of our products. As a business partner of (WALDOM ELECTRONICS) we are providing this letter to reiterate to you some of the requirements of our business relationship. These requirements are an integral part of the corporate policy of (WALDOM ELECTRONICS.) which mandates full compliance with the U.S. Export Administration Regulations, (EAR), and with all other U.S. Government regulations. Your careful attention to complying with these requirements is, therefore, requested and appreciated.

Pursuant to the corporate policy of (WALDOM ELECTRONICS.), under no circumstances will a sale, export or re-export transaction be made contrary to the U.S. Export Administration Regulations, (EAR), and/or all other applicable U.S. export regulations. That is,

1. No sale or resale of U.S. products are to be made to any individual or entity listed on the U.S. Sanctioned Parties Lists without prior approval from the U.S. Government. This Sanctioned Parties Lists is comprised of the following: the Denied Persons List, the Entities List, and the Specially Designated Nationals List.

<http://www.bis.doc.gov/complianceandenforcement/ListsToCheck.htm>

2. No sale or resale of U.S. products is to be made to any country subject to a U.S. trade sanction (embargo) without prior approval from the U.S. Government.
3. The end use of U.S. products for direct/indirect use in any nuclear/missile technology, chemical or biological application maybe controlled by U.S. export regulations and should be reviewed by (WALDOM ELECTRONICS.) prior to any sale. (WALDOM ELECTRONICS.) requests that our selling partners comply with this established company policy for all sales of (WALDOM ELECTRONICS') products. If you are unfamiliar with a customer or the customer's business practices, we ask that you check the web site listed below to verify that the sale is not made to a party on any of the U.S. Sanctioned Parties Lists. Please be advised that (WALDOM ELECTRONICS.) performs a 100% check against these lists prior to processing any order. Any order that is in question may be held for additional documentation prior to shipment, and/or may not be accepted. For your reference, below is a brief description of the lists and the website link:

### **A. U.S. SANCTIONED PARTIES LIST:**

The U.S. Department of Commerce publishes a compilation of the persons, firms, and entities in the United States and overseas which have or potentially

have violated U.S. export regulations. No transactions with any person, firm or entity appearing on these listings can be conducted without prior approval of (WALDOM ELECTRONICS.).

Please notify (Waldom Electronics.) if any requests are made by any such person, firm or entity.

**Entity List:** This is a list of organizations identified by the U.S. Department of Commerce as engaging in activities related to the proliferation of weapons of mass destruction. If a party appears on this list, please contact (WALDOM ELECTRONICS.) immediately in order that an application for a license to export to the U.S. Government may be submitted and secured prior to shipment.

**Denied Persons List:** This is a list of firms and individuals whose export privileges have been denied by the U.S. Department of Commerce. You may not participate in any export or re-export transaction with any person or firm appearing on this list. Note that some denied persons are located within the United States. If you believe a person whose export privileges have been denied wants to buy (WALDOM ELECTRONICS') products to export or re-export it, you must not make the sale and should report the situation immediately to (WALDOM ELECTRONICS).

**Specially Designated Nationals List:** The Department of the Treasury, Office of Foreign Assets Control (OFAC) is responsible for the oversight and publication of a list comprised of individuals and organizations deemed to represent restricted countries or known to be involved in terrorism and narcotics trafficking. Doing business with individual/companies on the SDN is strictly prohibited.

## B. SANCTIONS/EMBARGOES

The following countries are currently sanctioned for the resale of U.S. products and technology: Cuba - Iran - North Korea – Syria – Ukraine-Crimea Region.

Embargoed nations and other nations for which there are export sanctions often change, thus it is important that you monitor the list of embargoed nations for each export shipment. Please notify (U.S. SUPPLIER) if such a transaction should arise, U.S. Government licenses may be eligible for approval in certain circumstances.

## C. ENHANCED PROLIFERATION CONTROL INITIATIVE (EPCI)

(WALDOM ELECTRONICS.) commodities, software and technical data may not be used directly or indirectly in the design, development, fabrication or use of nuclear, chemical or biological weapons or missile technology (missiles that are capable of delivering a payload to a range of at least 300 kilometers) to country group {D:2}, {D:3}, or {D:4} without (WALDOM ELECTRONICS.'s) Export Compliance Department authorization.

See attached "Country Group List for {D:2}, {D:3}, and {D:4}.

As noted previously, compliance with these requirements is an integral part of the corporate policy of (WALDOM ELECTRONICS). As a business partner of (WALDOM ELECTRONICS), your acceptance of the terms outlined above is fundamental to our continuing business relationship.

If you should have any questions, please do not hesitate to contact me,

Respectfully yours,

Dave Tenorio  
Director, Global Logistics and Trade Compliance

Acknowledged by:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_



## APPENDIX H – GENERAL COMPLIANCE AGREEMENT

Waldom Electronics  
1801 Morgan St, Rockford, IL 61102

### **Export Compliance Assurance Letter**

Waldom Electronics is committed to helping to ensure our national security by, among other things, complying with all United States and applicable international export control laws. It is important to us that you, as our direct customer, similarly comply with applicable export control laws. By signing this letter, you hereby adopt and agree to the following statements:

We, (Customer/Distributor Name), hereby acknowledge and agree that we will not, directly or indirectly, knowingly export, re-export or re-sell an products purchased from Waldom Electronics or any of its affiliates, in violation of any export control laws of the United States of America, including, without limitation, the Export Administration Regulations, the International Traffic in Arms Regulations or the rules of the Office of Foreign Assets Control, or the applicable export control laws of any other country. Without limiting the generality of the foregoing, we will comply with any, and all applicable licensing requirements with respect to all such Waldom Electronics purchased products.

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Contact Name: \_\_\_\_\_

Position: \_\_\_\_\_

Email: \_\_\_\_\_

Phone: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## APPENDIX I – FOREIGN VISITOR GUIDE

Visitors, vendors, and service providers will present photo identification upon arrival, and a log will be maintained that records the details of the visit. All visitors should be escorted. In addition, all visitors and service providers should be issued a visitor badge that will be visibly displayed at all times during the visit.

A Visitor Registration Log will include the following:

- Date of the visit.
- Visitor's name.
- Verification of photo identification (type verified such as license or national ID card). Frequent visitors such as regular vendors may forego the photo identification but will still be logged in and out of the facility.
- Time of arrival.
- Company point of contact.
- Time of departure.