

EXPORT COMPLIANCE POLICY

It is the policy of Network Solutions to fully comply with all laws and regulations governing the export of both, products, services, software and technical data as contracted by Network Solutions with its numerous suppliers, and our own products, services, software and technical data. Each employee must be dedicated to ensure such compliance.

All sales, service, shipping, accounting and other personnel that may be involved in export shall be familiar with and review regularly:

EU Trade Policy Website: <https://www.consilium.europa.eu/en/policies/trade-policy/>

U.S. Bureau of Industry and security's Website: <http://www.bis.doc.gov/>

EU Sanctions Map Website: <https://www.sanctionsmap.eu/>

to ensure compliance with regulations. Particular attention should be taken when releasing technical information to foreign nationals, whether abroad or not, in electronic transmission of data/software and when hand carrying exports. Under no circumstances shall Network Solutions personnel sell or ship any product contrary to applicable export laws or shall these laws be compromised for personal gain. Neither sales nor shipments are to be made to any individual and/or firm appearing in the Denied Parties Lists of the U.S., and/or in EU sanctions database, and/or in any applicable export controls and regulations and/or to any firms owned by or associated with the individuals of firms therein listed. Moreover, no orders or shipments are to be made to any country subject to economic or trade sanctions imposed by the U.S. and/or EU unless otherwise authorized by applicable laws. Failure to comply with these regulations may result in the imposition of criminal and/or civil fines and penalties, including imposition of huge penalties on Network Solutions

In addition, regulations are in effect that place emphasis on the end-use and/or end-user of exported items (see United States 15 CFR 744.1 General Prohibition 4). As a result, Network Solutions need to be vigilant in screening our customers and transactions. It is, therefore, more important than ever that the "Know Your Customer" principles are understood and implemented in order that Network Solutions can meet the required "know" standard.

In particular, no transaction can be made when dealing with individuals, companies and countries involved with the proliferation of nuclear missile and chemical/biological related processes and/or weapons without a license from the U.S. Department of Commerce and/or applicable EU authority.

The Director of Network Solutions entity is jointly responsible for formal adoption of the policy in its respective entities, its implementation and compliance. This policy shall be brought to the attention of every employee related to export (sales, service, logistics, accounting, etc) and made available to any employee of the company by placing it at the announcement board, incorporating into the staff manual or by other means at the discretion of the Director. On a regular basis all such personnel shall be trained on the scope and application of export control compliance.

Non-compliance or possible non-compliance with any of the export laws and regulations that becomes known to any Network Solutions employee shall be immediately reported to the Director of Network Solutions.

ANNEX TO NETWORK SOLUTIONS EXPORT COMPLIANCE POLICY

On U. S. Regulations

For a short overview of the U.S. export control compliance please refer to “Introduction to Commerce Department Export Controls” in “Export Control Basics” section at: <http://www.bis.doc.gov>.

COMMERCE CONTROL LIST (CCL)

The Bureau of Industry and Security (BIS) maintains the Commerce Control List (CCL) within the Export Administration Regulations (EAR), which includes items (i.e., commodities, software, and technology) subject to the export licensing authority of BIS. The CCL does not include those items exclusively controlled for export or reexport by another department or agency of the U.S. Government. In instances where agencies other than the Department of Commerce administer controls over related items, entries in the CCL contain a reference to these controls.

The CCL is contained in Supplement No. 1 to part 774 of the EAR. Supplement No. 2 to part 774 of the EAR contains the General Technology and Software Notes relevant to entries contained in the CCL.

Details: <http://www.bis.doc.gov>.

COMMERCE COUNTRY CHART

BIS also maintains the Commerce Country Chart. The Commerce Country Chart, located in Supplement No. 1 to part 738, contains licensing requirements based on destination and Reason for Control. In combination with the CCL, the Commerce Country Chart allows you to determine whether a license is required for items on the CCL to any country in the world.

Details: <http://www.bis.doc.gov>.

LICENSE EXCEPTION

The License Exception is located in part 740 of the EAR. The Supplement No. 1 to part 740 contains the list of Country Groups A, B, C, D and E.

A “License Exception” is an authorization contained in this part that allows the company to export or reexport under stated conditions, items subject to the Export Administration Regulations (EAR) that would otherwise require a license under General Prohibition One, Two, Three, or Eight as indicated under one or more of the Export Control Classification Numbers (ECCNs) in the Commerce Control List (CCL) in Supplement No. 1 to part 774 of the EAR and items subject to the EAR that would require a license based on the embargo policies described in part 746 of the EAR.

In the Supplement No. 1 to part 740 the following countries CUBA, IRAN, NORTH KOREA, SUDAN and SYRIA are included into Country Group E:1 of Terrorist Supporting Countries where any export or re export is prohibited.

Details: <http://www.bis.doc.gov>.

LISTS TO CHECK

The following lists may be relevant to your export or re-export transaction.

DENIED PERSONS LIST

A list of individuals and entities that have been denied export privileges. Any dealings with a party on this list that would violate the terms of its denial order is prohibited.

Details: <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/denied-persons-list>.

UNVERIFIED LIST

A list of parties where BIS has been unable to verify the end use in prior transactions. The presence of a party on this list in a transaction is a “red flag” that should be resolved before proceeding with the transaction.

Details: <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/unverified-list>.

ENTITY LIST

A list of parties whose presence in a transaction can trigger a license requirement under the Export Administration Regulations. The list specifies the license requirements that apply to each listed party. These license requirements are in addition to any license requirements imposed on the transaction by other provisions of the Export Administration Regulations.

Details: <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list>.

SPECIALLY DESIGNATED NATIONALS LIST

A list compiled by the Treasury Department, Office of Foreign Assets Control (OFAC). OFAC’s regulations may prohibit a transaction if a party on this list is involved. In addition, the Export Administration Regulations require a license for exports or re-exports to any party in any entry on this list that contains any of the suffixes "SDGT", "SDT", "FTO" or "IRAQ2".

Details: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>.

DEBARRED LIST

A list compiled by the State Department of parties who are barred by §127.7 of the International Traffic in Arms Regulations (ITAR) (22 CFR §127.7) from participating directly or indirectly in the export of defense articles, including technical data or in the furnishing of defense services for which a license or approval is required by the ITAR.

Details: <http://www.pmddtc.state.gov/compliance/debar.html>.

NONPROLIFERATION SANCTIONS

Several lists compiled by the State Department of parties that have been sanctioned under various statutes. The Federal Register notice imposing sanctions on a party states the sanctions that apply to that party. Some of these sanctioned parties are subject to BIS’s license application denial policy described in §744.19 of the EAR (15 CFR §744.19).

US AND EU SANCTIONS RELATIVE TO RUSSIA AND CRIMEA

In particular, we would like to remind you of your compliance obligations related to the sanctions and trade controls implemented by the United States and European Union against Russia. As it relates to the distribution, sale, and use of products you purchase from Network Solutions that are under applicable export and import laws and regulations (Applicable Products), you are required to:

- 1.** Conduct appropriate screening of your customers and end-users to ensure that you do not export, re-export, transfer or divert any of Applicable Products to any person, entity or destination that is restricted, including (a) any person or entity on OFAC's List of Specially Designated Nationals (SDN) and Blocked Persons, (b) any person or entity on the European Union's list of "designated parties" and (c) entities owned or controlled (50% or more) by a person or entity on the OFAC SDN list.
- 2.** Not export, re-export, transfer, divert, any of the Applicable Products for use in, or in support of deep water, arctic or shale oil and gas exploration and production activities.
- 3.** Not export, re-export, transfer, divert, any of the Applicable Products for activities, directly or indirectly, related to the Russian military or other military end-users in Russia.
- 4.** Not export, re-export, transfer, divert, any of the Applicable Products for activities, directly or indirectly, related to activities involving Russian-made defense articles (including spacecraft) and defense articles for end-use in Russian.
- 5.** Not engage in transactions in, providing financing for, or otherwise dealing in new debt with maturity of longer than 30 days, or equity for persons identified on the Sectoral Sanctions Identifications List.
- 6.** Not export, re-export, sell or otherwise supply Applicable Products to Crimea.

By purchasing Applicable Products from Network Solutions, you acknowledge and agree that you will conduct your business activities in full compliance with these and any other requirements related to the US and EU sanctions against Russia.