



Corporate Guideline

# Export Compliance Policy

**utimaco**<sup>®</sup>

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## 1 EXPORT INFORMATION ON UTIMACO PRODUCTS

Utimaco is committed to complying with the laws and regulations relating to export controls. As part of this compliance effort, Utimaco agreements contain provisions requiring Utimaco customers and partners to ensure compliance with these laws and regulations. In order to assist our customers and partners, Utimaco uses this portion of its website to communicate general export control information specific to its products to our customers and partners. This information may be required for shipping documentation, record keeping, or post-shipment reporting.

Customers and partners are encouraged to familiarize themselves with the import regulations of their country to ensure compliance with their specific regulations and to ensure timely delivery of Utimaco products they may purchase.

NOTE: The contents on this website are not tailored to the needs of a specific entity or a particular export scenario. The information provided below is for general information purposes only and to get partners and customers started in understanding export controls obligations. Exportation of restricted goods is a complex area and while Utimaco will make reasonable efforts to maintain the information on this website, you are responsible for seeking your own legal advice and ensuring your compliance in relation to such matters.

## 2 GLOBAL EXPORT CONTROLS

Utimaco is committed to complying with all applicable laws and regulations of the United States, the European Union and every country in which it conducts business. Non-compliance with legal provisions can subject Utimaco as well as its Business Partners to criminal and civil penalties, the seizure of assets, and the denial of import or export privileges.

Utimaco is dedicated to providing sufficient time, funds and personnel. Export control requirements depend on the knowledge of the end-use, end customer, ultimate destination and other circumstances relating to our or the customer's export activities in order to prevent export infringements. These requirements also include catch-all clauses related to nonproliferation and the prohibition to proceed with any transaction with the knowledge or the reason to believe it may constitute a violation of the applicable provisions.

Essential core beliefs are to comply with the relevant law, to admit to our social responsibility and to prevent the misuse of our technology. Based on these beliefs and to ensure a responsible handling of IT-security products, Utimaco has established a Know Your Customer (KYC) policy. We have implemented our KYC policy as a risk-focused process, in which we document and verify the identity of Business Partners and end customers and assess the plausibility of the product's end-use. Before confirming any orders, Utimaco demands detailed information from Business Partners to perform export control related identity and compliance checks.

At Utimaco export control compliance, along with our anti-bribery and anti-corruption Code of Conduct, is a key aspect of our Business Ethics. Thus, we also expect our Business Partners to strictly observe all applicable laws and regulations concerning the export and import of goods, services and information. Utimaco requires that any party, we conduct business with, becomes familiar with and ensures compliance with US, EU and German export regulations, and any relevant export or import regulations in the countries, in which it operates.

On occasion, Utimaco will send communications on important regulatory developments in order to provide our partners with additional knowledge and increase awareness on certain topics.



### 3 GLOBAL EXPORT CONTROLS PRODUCT CLASSIFICATION

Product	Description	Product Type	US ECCN	US License Exception	CCATS	US HTS Code	EU Export Control Classification	EU Commodity Code
<b>Information Security Business</b>								
<b>Utimaco Products</b>								
Se-Series	SecurityServer PCIe-Cards and LAN-Versions (Models Se10, Se50)	Hardware	5A002a.1	ENC	G165699	8471.80.10	5A002A1	84718000
Se-Series-Gen2	SecurityServer PCIe-Cards and LAN-Versions (Models Se12, Se52, Se500, Se1500)	Hardware	5A002a.1	ENC	G165700	8471.80.10	5A002A1	84718000
CSe-Series	SecurityServer PCIe-Cards and LAN-Versions (Models CSe10, CSe100)	Hardware	5A002a.1	ENC	G165699	8471.80.10	5A002A1	84718000
Se-Series Software	SecurityServer Firmware for all Se-	Software	5D002c.1	ENC	G165699	N/A	5D002C1	N/A
Se-Series Gen2 Software	SecurityServer Firmware for all Se Gen2-Models	Software	5D002c.1	ENC	G165700	N/A	5D002C1	N/A
CSe-Series Software	SecurityServer Firmware for all CSe-Models	Software	5D002c.1	ENC	G165699	N/A	5D002C1	N/A
CryptoServer SDK	Software Development Kit	Software	5D002c.1	ENC	G165700	N/A	5D002C1	N/A
CryptoServer Simulator	Simulator Software/Emulator for	Software	5D002c.1	ENC	G165700	N/A	5D002C1	N/A
SmartCard Reader	USB PinPad Reader	Hardware	5A992.c	N/A	self-classified	8471.90.00	N/A	84719000
SmartCard	SmartCard for CryptoServer Administration	Hardware	5A992.c	N/A	self-classified	8523.52.00	N/A	85235200
Slide Rails	Pair of slide rails for rackmount installation	Hardware	EAR99	N/A	self-classified	8473.30.91	N/A	84733080
Power Supply Module	CryptoServer Power Supply Module	Hardware	EAR99	N/A	self-classified	8504.40.60	N/A	85044030
Power Supply Unit	CryptoServer redundant power supply unit	Hardware	EAR99	N/A	self-classified	8504.40.60	N/A	85044030
<b>Utimaco Atalla Products</b>								
Atalla A10160 AKB HSM		Hardware	5A002a.1	ENC	self-classified	8471.80.10	5A002A1	84718000
Atalla A10160 Variant HSM		Hardware	5A002a.1	ENC	self-classified	8471.80.10	5A002A1	84718000
Atalla AT1000 HSM		Hardware	5A991.b	N/A	G183533	8471.80.10	5A002A1	84718000
Atalla AT1000 Software		Software	5A991.b	N/A	G183533	N/A	5D002C1	N/A
Atalla Chain of Trust		Hardware	5A002a.1	ENC	self-classified	8471.80.10	5A002A1	84718000
u.trust 360		Hardware	EAR99	N/A	G185163	8471.80.10	5A002A1	84718000
ESKM Server v5		Hardware	5A002a.1	ENC	self-classified	8471.50.01	5A002A1	84715000
ESKM Enterprise Secure Key Software		Software	5D002c.1	ENC	G183722	N/A	5D002C1	N/A
ESKM – Enterprise Secure Key Manager		Hardware	5A002a.1	ENC	G183722	8471.50.01	5A002A1	84715000
Atalla Secure Configuration Assistant (SCA) v3		Hardware	EAR99	N/A	G183840	8471.30.01	N/A	84713000
Atalla Backup SmartCard Pack v1 (SCA-2 Shareholder Smart Cards)		Hardware	EAR99	N/A	G183840	8523.52.00	N/A	85235200
Atalla Admin SmartCard Pack v1 (SCA-2 Administrator Smart Cards)		Hardware	EAR99	N/A	G183840	8523.52.00	N/A	85235200
Atalla Backup SmartCard Pack v2 (Enhanced SW Shareholder Smart Cards)		Hardware	EAR99	N/A	G183840	8523.52.00	N/A	85235200
Atalla Admin SmartCard Pack v2 (Enhanced SW Administrator Smart Cards)		Hardware	EAR99	N/A	G183840	8523.52.00	N/A	85235200



Atalla Backup SmartCard Pack v3		Hardware	EAR99	N/A	G183840	8523.52.00	N/A	85235200
Atalla Admin SmartCard Pack v3		Hardware	EAR99	N/A	G183840	8523.52.00	N/A	85235200
Product	Description	Product Type	US ECCN	US License Exception	CCATS	US HTS Code	EU Export Control Classification	EU Commodity Code
Atalla USB Pen drive		Hardware	EAR99	N/A	self-classified	8523.51.00	N/A	85235110
Physical keys		Hardware	EAR99	N/A	self-classified	8301.70.00	N/A	83017000
Atalla Boxcar Software		Software	5D002c.1	ENC	self-classified	N/A	5D002C1	N/A
Atalla Ax160 Software		Software	5D002c.1	ENC	self-classified	N/A	5D002C1	N/A
<b>Utimaco Keybridge Products</b>								
KeyBridge POI		Hardware	5A991.b	N/A	G184246	8471.80.10	5A002A1	84718000
KeyBridge UKM		Hardware	5A991.b	N/A	G184246	8471.80.10	5A002A1	84718000
<b>Geobridge</b>								
Geobridge TokenBridge		Hardware	5A002a.1	ENC	G184247	8471.80.10	5A002A1	84718000
<b>Other Products</b>								
Q-safe		Software	5D002c.1	N/A	Self-classified	N/A	5D002C1	N/A
<b>Telecommunication Solutions Business</b>								
LIMS Hardware	Standard Industrial Telecommunication Equipment (Server, UPS, Switch, Rack, ...) with Encryption Kernel	Hardware	N/A	N/A	N/A	N/A	5A002A4	84715000
LIMS Software	LIMS Management Server & Mediation Devices with Encryption Functionality	Software	N/A	N/A	N/A	N/A	5D002C1	N/A

This classification matrix is for general informational purposes only and does not constitute advice by Utimaco as to any particular actual set of facts. All export control classification numbers, customs tariff numbers and the CCATS numbers provided herein are subject to change without notice. Any modifications or changes, after leaving Utimaco facility, will be your responsibility to obtain further classifications.

Any questions or concerns relating to this commitment should be addressed to Utimaco's export compliance team directly: [export.compliance@utimaco.com](mailto:export.compliance@utimaco.com)

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