



AEROTEH S.A.

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- Cod Înregistrare Fiscală: RO 448560
- Nr. Registrul Comerțului: J40/23/28.12.1990
- Cod IBAN, în Lei: RO08 BREL0002001046820100, deschis la LIBRA INTERNET BANK
în \$: RO40 BREL0002001046820300, deschis la LIBRA INTERNET BANK
în €: RO24 BREL0002001046820200, deschis la LIBRA INTERNET BANK
- Capital Social Varsat : 10.558.327,50 LEI



To: AEROTEH S.A. employees with responsibilities in foreign trade activities and coordination of production of strategic goods (military and dual-use)

From: Dumitru BĂNUȚ, General Director

Subject: Statement of Principles - Policy on Strategic Export Control / Internal Compliance Programm

Date: November 15th, 2022

I. The purpose of this Statement of Principles is to outline the company's general policy on export control of the strategic goods (military and dual-use¹) and on the defence manufacturing activities.

The commitment of AEROTEH S.A. is to comply with all export control policies, laws, regulations and procedures issued by the National Export Control Authority (Ministry of Foreign Affairs / Department for Export Controls – ANCEX).

For the successful fulfilment of the mentioned objective, the export control activities of strategic products are/will be under the direct coordination of the general director.

Mrs. Loredana DINU, commercial director and *Contact Person in the relationship with ANCEX*, will periodically update the Internal Compliance Program (ICP), which will define new operational procedures and new responsibilities that will ensure compliance with the legislation in force.

II. Romania participates in the majority of multilateral non-proliferation and export control regimes, that ensure the control of transfers of military or dual-use equipment, materials, software and technologies.

Also, Romania is a State Party to almost all international conventions and treaties in the field of non-proliferation and arms control, among which I mention the Arms Trade Treaty, the Chemical Weapons Convention, the Anti-Personal Mine Ban Convention, and respects in its export controls the ECOWAS Convention on Small Arms and Light Weapons.

Although Romania is not yet a signatory to the Convention on Cluster Munitions, AEROTEH S.A. has decided, since the year 2008, not to be involved in the production of cluster munitions and is strong committed not to produce in the future any components for

¹ Export, import and intra-Community transfer, permanently or temporarily, from or in the territory of Romania; brokerage activities; transit through Romania; transshipment carried out on the territory of Romania.

such munitions, and nor to participate in any governmental or industrial cooperation program with other companies for the production or development of cluster munitions.

Moreover, in order to eliminate any doubts regarding its current or future activity in the field of the defence industry, AEROTEH S.A. decided to delete from its object of secondary activity *the manufacture of armaments and ammunition - CAEN code 2540*².

III. Whenever required by law, AEROTEH S.A. will request licenses for import, export or for intra-Community transfer, in order to sale its products or it will request consultancy (to ANCEX) on the incidence of such goods with the export control regime, and their inclusion as subject of control in the National Control Lists, related to the goods and the technology, or related to the user or the end use of the such goods and technology.

Mrs. Director Loredana DINU will provide details, upon request, regarding licensing conditions for all types of transactions, including the technical exchanges and detailed sharing information regarding the sale of the company's products.

IV. Violation of policies, laws and regulations of export control regime may involve the responsibility of AEROTEH S.A., and the guilty persons may be administratively or criminally sanctioned. The loss of the company's privileges to import, export or intra-Community transfer of certain goods would have a strong negative impact on sales and the ability to remain competitive. Any employee of AEROTEH S.A. who intentionally violates the regulations will be severely penalized, including by the measure of termination of the employment contract.

V. With the occasion of the review of this Internal Compliance Program if you will identify that certain practices or transactions are not in accordance with the actual export control regulations, please report them immediately to the director general of the company, in order to inform ANCEX and applying the necessary legal measures.

Thank you for your attention and support for the implementation of the Internal Compliance Program, which will make AEROTEH S.A. stronger and more competitive company.

² On November 8th, 2022, the General Meeting of Shareholders of AEROTEH S.A. decided to remove from the scope of activity related to CAEN code 2540 – *Manufacture of armaments and ammunition*.