

Import and Export Compliance Policy

1. Purpose

This policy outlines the measures and responsibilities established by VBN Components AB to ensure full compliance with applicable import and export laws, customs regulations, and trade control requirements in all jurisdictions where we operate.

2. Scope

This policy applies to all employees, contractors, and business partners involved in the movement of goods, technical data, and related documentation across national borders on behalf of VBN Components AB.

3. Legal Compliance

VBN Components AB complies with all applicable:

- Swedish import and export laws
- EU regulations (including dual-use regulations and sanctions lists)
- U.S. export controls, if applicable (e.g. EAR, ITAR, OFAC)
- Local customs and border authority requirements in countries of destination or origin

No goods, services, or technologies shall be imported to or exported from any jurisdiction unless fully authorized and documented.

4. Import/Export Procedures

To ensure proper control and traceability, the following procedures must be followed:

- **Classification:** All goods must be accurately classified under the appropriate customs tariff code (HS code or equivalent).
- **Licensing:** When required, valid import/export licenses, end-user certificates, or other regulatory approvals must be secured before shipment.
- **Documentation:** Each transaction must be supported by proper documentation, including invoices, shipping declarations, packing lists, certificates of origin, and any special permits.
- **Screening:** In cases where a potential risk of non-compliance is identified, the parties (customers, suppliers, agents) can be screened against applicable denied or restricted party lists.
- **Record-Keeping:** Documentation for each transaction must be retained for a minimum of 5 years, or longer if required by law.

5. Consequences of Non-Compliance

Non-compliance with this policy or with import/export laws may lead to:

- Fines and penalties imposed on VBN Components AB and/or individuals
- Confiscation or seizure of goods
- Suspension of trading privileges
- Termination of employment or business relationships
- Criminal prosecution in serious cases

6. Responsibility and Oversight

It is the responsibility of each department involved in international transactions to ensure that this policy is understood and followed. Questions regarding trade compliance should be directed to the CEO or designated trade compliance officer.

Information on this policy will be provided to employees involved in logistics, procurement, and sales functions.

A handwritten signature in blue ink, reading "Magnus Bergman". The signature is fluid and cursive, with a period at the end.

Magnus Bergman, CEO, VBN Components AB