



## GROUP POLICY

Owner

CEO

Valid for

Axis Group

Approved by

Axis AB Board of Directors

Reviewed

2025-03-04

Managed by

Legal Department

Security

Public

# *Group Export Control Policy*

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## 1 Purpose

Some of Axis' products may, due to export control classified components, software or technology, be subject to export control.

Axis is committed to compliance with all applicable export control laws and regulations pertaining to its operations, including but not limited to the European Union Regulation (EU) 2021/821<sup>1</sup> and the U.S. Export Administration Regulations<sup>2</sup>. When we refer to Axis in this document, we mean all entities directly or indirectly controlled by Axis AB.

## 2 Scope

This policy applies to all employees, contingent workers, and consultants, as well as management and board members (each an "Axis Representative") in all of Axis operations and in all other activities and work connected to, or on behalf of, Axis.

This commitment extends to promoting strict compliance on an on-going basis with the terms and conditions of applicable export controls. Axis expects all Axis Representatives to promote this policy in all their business relations with third parties. For the purpose of this policy, *third parties* include, but are not limited to, suppliers, distributors, system integrators, resellers, and end-customers.

## 3 Main principles

Exports, re-exports or transfer of any Axis commodity, technology, or software subject to export control must be done in accordance with applicable export control laws and regulations, which might require an appropriate export authorization.

Export, re-export or transfer, directly or indirectly, of any Axis commodity, technology, or software subject to export control, to prohibited and/or sanctioned parties according to applicable export control laws and regulations is not allowed.

Axis will prevent any use of Axis items for any purpose prohibited by applicable export control laws and regulations; including, without limitation, nuclear, chemical, or biological weapons proliferation.

Axis expects Axis Representatives to comply with applicable export control laws and regulations; including requirements related to international travel, the proper handling, transfer, access, storage, control, and dissemination of hardware, software, information, technology, and technical data subject to export control.

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<sup>1</sup> Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items.

<sup>2</sup> Title 15 of the U.S. Code of Federal regulations, § 730- § 780.

## 4 Roles and responsibilities

The Axis Internal Export Control Compliance Program (IECP) stipulates responsibilities and procedures for assuring compliance with applicable export control laws and regulations. The Axis Legal Department manages the IECP.

The Axis Export Compliance Team is responsible for monitoring and application of the Export Control Policy in the Axis Export Control System and export procedures, including but not limited to, the screening process, export control classification and license determinations.

Managers within each Axis department are responsible for assuring development and implementation of procedures to ensure compliance in accordance with this policy when handling items subject to export control.

Axis has established an Export Compliance Committee that will assist in the facilitation and implementation of the Group Export Control Policy.

## 5 Implementation

### 5.1 Communication

The latest approved and valid version of this policy is available on the Group Policies page on Axis intranet Galaxis and on axis.com.

### 5.2 Training

All Axis Representative shall acknowledge Axis' top-level management commitment to Export Control Compliance.

Any Axis Representative associated with export activities will be trained prior to engaging in an export related activity.

Axis also provides a digital General Export Control Awareness session available for all Axis Representatives and tailored Export Control Awareness sessions with different departments, groups, projects etc. at Axis.

## 6 Compliance

Axis Representatives found to have violated this policy risk disciplinary actions up to and including termination of employment.

Axis Representatives who suspect violations of this policy are expected to raise the issue to their manager, The Export Compliance Team, Legal Department, or the Axis Management Team. Axis Representatives can also raise concerns in accordance with the Group Whistleblower Policy.

Axis does not accept any retaliation against someone who raises concerns in good faith.

## 7 Supporting documents

Axis Group Policy - Code of Conduct  
Group Whistleblower Policy