

Export Control and Trade Sanctions Compliance Policy

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Company Proprietary Information

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I. PURPOSE AND POLICY STATEMENT

Striim, Inc. (together with its subsidiaries, “*Striim*” or the “*Company*”) is committed to complying fully with all applicable laws and regulations related to export controls and trade sanctions. The purpose of this Export Control and Sanctions Compliance Policy (the “*Policy*”) is to facilitate compliance by Striim with all applicable export control and trade sanctions laws, including, but not limited to, the U.S. Export Administration Regulations, the U.S. International Traffic in Arms Regulations, U.S. sanctions regulations administered by the U.S. Treasury Department’s Office of Foreign Assets Control, and similar applicable laws in any other jurisdictions where the Company conducts business (collectively, “*Export and Sanctions Laws*”).

This Policy applies to all directors, officers, employees, and individuals serving as independent contractors of Striim and any of its subsidiaries (collectively “*Representatives*”). All Representatives must comply with all applicable Export and Sanctions Laws.

Failure to comply with this Policy and any applicable Export and Sanctions Laws could lead to business disruptions, harm to Striim’s reputation, loss of export privileges, and/or significant civil and criminal penalties for Striim and individual Representatives. Representatives who violate this Policy are subject to appropriate disciplinary action, including demotion, reassignment, additional training, probation, suspension, or even termination.

II. EXPORT COMPLIANCE OFFICER

Striim has appointed an Export Compliance Officer (“*Export Compliance Officer*”), identified in Section XI. below, who is responsible for ensuring Striim’s compliance with this Policy and applicable Export and Sanctions Laws. In addition to the specific duties set forth herein, the Export Compliance Officer has full authority to implement and enforce this Policy.

III. EXPORT CONTROL LAWS

A. Export Administration Regulations

Striim’s products and technology are subject to the export licensing jurisdiction of the U.S. Export Administration Regulations (“*EAR*”). The Export Compliance Officer is responsible for working with relevant Striim personnel and/or outside counsel to determine the export classification of the Company’s products (including product components and spare parts) and technology, including the applicable Export Control Classification Number or ECCN, destination controls, and any associated licensing, classification or reporting requirements.

1. Encryption

Certain Striim products and technology may incorporate encryption functionality. The EAR prohibit the export of certain encryption items without obtaining a commodity classification and/or license from the U.S. Commerce Department. As discussed above, the Export Compliance Officer will work with relevant

Striim personnel and/or outside counsel determine the export classification of the Company's products, including whether they require a license from the U.S. Commerce Department.

2. Deemed Exports to Foreign Nationals in the United States

Disclosure of technology, including software source code, to foreign persons in the United States (any person who is not a U.S. citizen or permanent resident alien (i.e., green card holder)) of certain nationalities, requires a "deemed export" license under the EAR.

Before Striim engages in an activity that could result in a deemed export, such as the employment of a foreign national to whom software source code will be disclosed, the Export Compliance Officer must be consulted to ensure that any required export license or authorization is obtained prior to the disclosure of the source code (export controlled technology) to such foreign person.

3. Exports of Technology

Exports of Striim technology, such as for offshore research and development or manufacturing activities, may require a license or other governmental authorization prior to export outside the United States. You must consult with the Export Compliance Officer prior to verbally communicating or electronically transferring or releasing any Striim technology, including technical information necessary for the development or production of the Company's products, outside the United States.

B. End-Use Prohibitions and Red Flags

Products or technology destined for certain end uses or end users may be subject to restrictions and/or licensing requirements under the EAR, even if the product or technology would not otherwise be subject to licensing requirements. The primary reason for these requirements are to support U.S. policies of nonproliferation of nuclear, missile, chemical and biological weapons and U.S. antiterrorism policy. In addition, the EAR also restricts certain activities of U.S. persons, such as contracting, financing, and freight forwarding, that could be considered as assisting the proliferation of nuclear, missile, chemical and biological weapons activities. Representatives must be alert to any circumstances or "red flags" indicating that an export may be destined for a prohibited end use, end user, or destination. The U.S. Commerce Department publishes a list of such "red flags," which is available at <https://www.bis.doc.gov/index.php/enforcement/oe/compliance/23-compliance-a-training/51-red-flag-indicators>, and includes:

- The customer or purchasing agent is reluctant to offer information about the end-use of the item.
- The product's capabilities do not fit the buyer's line of business, such as an order for sophisticated computers for a small bakery.
- The item ordered is incompatible with the technical level of the country to which it is being shipped, such as semiconductor manufacturing equipment being shipped to a country that has no electronics industry.

- The customer is willing to pay cash for a very expensive item when the terms of sale would normally call for financing.
- The customer has little or no business background.
- The customer is unfamiliar with the product's performance characteristics but still wants the product.
- Routine installation, training, or maintenance services are declined by the customer.
- Delivery dates are vague, or deliveries are planned for out of the way destinations.
- A freight forwarding firm is listed as the product's final destination.
- The shipping route is abnormal for the product and destination.
- Packaging is inconsistent with the stated method of shipment or destination.
- When questioned, the buyer is evasive and especially unclear about whether the purchased product is for domestic use, for export, or for reexport.

If you have reason to know or suspect that a transaction may involve a prohibited end use, you must stop all activity and consult with the Export Compliance Officer. No Representative is permitted to complete any transaction, shipment, or release of technology that has been identified as a suspect transaction or that involves a “red flag,” until after it is reviewed and approved by the Export Compliance Officer. Immediately stop all activity and seek assistance of the Export Compliance Officer when a potential compliance issue is spotted.

IV. TRADE SANCTIONS

The U.S. Treasury Department’s Office of Foreign Assets Control (“*OFAC*”) administers several different types of trade sanctions, including:

- **Country-specific sanctions or economic embargoes** generally prohibit all direct or indirect (through third parties) transactions and business activities involving certain countries and all government and non-government entities and individuals located or resident therein. The United States maintains comprehensive economic sanctions against Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine (collectively, the “*Sanctioned Countries*”). In addition, OFAC administers broad sanctions against the Government of Venezuela, including entities owned or controlled by the Government of Venezuela.
- **List-based sanctions** prohibit or restrict direct or indirect (through third parties) transactions with certain entities and individuals that appear on certain restricted party lists, including the Specially Designated Nationals and Blocked Persons List, the Foreign Sanctions Evaders List, and the Sectoral Sanctions Identification List (collectively, the “*OFAC Lists*”).

- **Sectoral sanctions** are a type of list-based sanctions that prohibit certain types of direct or indirect (through third parties) transactions with entities and individuals that appear on the Sectoral Sanctions Identification List. The sectoral sanctions target certain sectors of the Russian economy, including the financial services, energy, defense and related material sectors. In most cases, only certain types of transactions involving a designated entity, e.g., the purchase of new debt or equity, are prohibited.

Under U.S. sanctions laws, Striim may be required to block funds associated with individuals or entities on the OFAC Lists, if such funds come within the Company's possession or control. Under OFAC's regulations, funds subject to blocking must be placed in a segregated interest-bearing account and a report of blocked property must be submitted to OFAC within 10 business days. Blocked property is also subject to an annual reporting requirement.

You must consult the Export Compliance Officer before engaging in any transaction potentially involving, directly or indirectly, a Sanctioned Country, their nationals (wherever located), or any entity or individual on an OFAC List.

To comply with this Policy, Striim has implemented procedures for screening its customers, vendors, and partners against the OFAC Lists, as described in Section V. below. In addition, Striim has implemented geo-IP restrictions to prevent its web-based products and services (including software downloads, updates, and bug fixes), from being accessed by or distributed to end-users with IP addresses associated with the Sanctioned Countries.

V. RESTRICTED PARTY SCREENING

Striim will screen all customers, resellers, distributors, and other third party business partners against the OFAC Lists and other applicable restricted party lists, including the Denied Persons List, the Unverified List, and the Entity List, maintained by the U.S. Commerce Department's Bureau of Industry and Security (collectively, the "***Restricted Party Lists***"). Striim will implement procedures for screening against the Restricted Party Lists ("***Restricted Party Screening***") and will screen customers, resellers, distributors, and other third party business partners before on-boarding or entering into a relationship, and will screen all current customers and business partners on a semi-annual basis.

The Export Compliance Officer will be responsible for managing the Restricted Party Screening process and delegating persons, as appropriate, to conduct the screening and to review screening results. In addition, the Export Compliance Officer will ensure that any agreements with a third party acting on behalf of Striim will include language prohibiting sales or services to customers who are located or resident in a Sanctioned Country or appear on a Restricted Party List.

VI. ANTI-BOYCOTT RULES

The U.S. Commerce Department and the Internal Revenue Service ("***IRS***") administer rules governing compliance with non-approved international boycotts, particularly the Arab League boycott of Israel. U.S.

companies and their controlled foreign subsidiaries or branches are not permitted to comply with requests for information that support unauthorized boycotts. Other prohibited boycotts may involve boycotts on India or Pakistan. A boycott request may take the form of a questionnaire, an informal written request for information, or a certification requirement. The mere receipt of boycott requests often must be reported.

Under these laws, the following actions are prohibited:

- refusing to do business with a boycotted country, nationals or companies of a boycotted country, or “blacklisted” companies;
- furnishing boycott-related information, including information about business relationships with a boycotted country, nationals or companies of a boycotted country, or “blacklisted” companies;
- discriminating against any U.S. person on the basis of race, religion, sex, or national origin;
- agreements to refuse to do business directly or indirectly within a country or with a country’s government, companies or nationals;
- agreements to refuse to do business with U.S. persons who do business in a country or with its government, companies, or nationals;
- agreements to refuse to do business with companies owned or managed by individuals of a particular race, religion, or nationality;
- agreements to refrain from employing persons of a particular race, religion, or nationality; and
- agreements to refuse to ship or insure products on carriers owned or operated by persons who do not participate in or cooperate with the boycott.

You must not respond to questionnaires or other requests for information regarding Striim’s business activities with or concerning Israel (or any similar request regarding India, Pakistan, or other countries subject to unapproved boycotts). If you receive such a request, you must not respond or take any further action until you have consulted with the Export Compliance Officer. The Export Compliance Officer will prepare and submit any required reports to the U.S. government, and contact Striim’s tax preparer to ensure compliance with IRS regulations.

VII. RECORDKEEPING

Recordkeeping is an essential part of Striim’s compliance with applicable Export and Sanctions Laws. Specifically, U.S. export control laws require that records of covered transactions be maintained for a period of five years from the latter of the date of export, the exhaustion of the export license authorizing the transaction, or the expiration of the export license or authorization. Pursuant to these requirements, the following materials should be maintained:

- Inquiries;

- Purchase orders;
- Invoices;
- Shipper's Export Declarations or the electronic equivalent;
- Letters of credit;
- Any export licenses or other approvals issued by a U.S. government agency;
- Export license applications;
- Other documents relating to an export transaction, such as faxes, letters, e-mails, or notes relating to the transaction;
- Restricted Party Screening records;
- Any paperwork detailing internal export control assessments, including any documentation regarding the applicability of any licensing exceptions, or a determination that information is not subject to control; and
- Classification decisions issued by the relevant government agency.

For any transaction or property that has been blocked for purposes of sanctions compliance, records must be retained for as long as a block is in place. Once unblocked, records must be maintained for a minimum of five years, or longer where relevant, after the date of unblocking. Records that must be retained include, but are not limited to, books of account, contracts, standing instruction records, letters, email, memoranda or other papers connected with a transaction.

You should consult with the Export Compliance Officer if you have any questions regarding whether particular documents are required to be maintained, or whether the retention period for a transaction has expired.

VIII. TRAINING AND UPDATES

Striim's products and technology, as well as the Export and Sanctions Laws applicable to the Company's business, change over time. The only way to ensure that Striim remains compliant with such laws is to update and comply with this Policy.

The laws and regulations governing Striim's compliance obligations are subject to frequent change with little or no notice. The Export Compliance Officer will review this Policy annually and update it, as appropriate, to reflect such changes.

Periodic compliance training will be provided to relevant Representatives, identified by the Export Compliance Officer, to ensure that they are familiar with applicable Export and Sanctions Laws and Striim's internal procedures.

IX. AUDITS AND INVESTIGATIONS

Routine audits may be performed periodically by or under the oversight of the Export Compliance Officer to ensure adherence to this Policy. Striim, under the oversight of the Export Compliance Officer, and in consultation with outside legal counsel, will investigate reported violations of law and, if appropriate, report them to law enforcement officials or take other legal action. All Representatives must cooperate fully with such audits or investigations.

If Striim or any Representative is contacted by a government enforcement agent concerning an international trade or other legal compliance matter, that contact must be referred immediately to the Export Compliance Officer.

X. CERTIFICATION

You will be asked to complete an electronic acknowledgement that you have read this Policy. The Company may require you to recertify your compliance with this Policy on a periodic basis.

XI. REPORTING AND QUESTIONS

Representatives have an affirmative obligation to report any apparent or suspected violations or circumventions of this Policy, including by a third party, to the Export Compliance Officer via email or mail as follows:

Taly Avigdory
Striim, Inc.
575 Middlefield Road
Palo Alto, CA 94301
compliance@striim.com

Reports may also be submitted anonymously. However, we encourage you to consider revealing your identity so that we can properly follow up and investigate alleged violations. Striim will ensure that appropriate confidentiality measures are taken and will not retaliate against any individual for reporting violations in good faith.

We welcome any comments or questions that you may have regarding the substance and implementation of this Policy. Please direct such communications to the Export Compliance Officer.