Export Control and Sanctions Policy
November 2026

Endace's commitment to responsible global trade

Introduction

Endace is committed to conducting business responsibly and in compliance with applicable export control, sanctions and trade laws. These requirements help protect national and international security, prevent the proliferation of weapons, and reduce the risk that products and technology are supplied to prohibited destinations, persons or end uses.

This policy explains the standards that apply when customers, resellers, distributors, channel partners and other third parties obtain, use, transfer or provide access to Endace products, software, services or technology.

Application

This policy applies to all Endace products, hardware, software, services and technology, including technical data and updates (collectively, **Endace products and technology**). It also applies to every transaction or activity involving their sale, supply, export, re-export, transfer, release, access or use.

For export control purposes, an export may include more than a physical shipment. It may also include electronic transmission, remote access, downloads, disclosure of technical information, or another release of controlled software or technology to a person in another country or, where applicable, to a foreign national.

Customers and partners are responsible for understanding and complying with the laws that apply to their activities and locations.

Commitment

Endace maintains an export compliance program designed to identify and manage applicable trade-control risks. Depending on the transaction, our controls may include:

- classifying Endace products and technology under applicable export control regimes (specified in section 4);
- screening customers, end users and other transaction parties against relevant restricted-party lists;
- assessing destination, end use, end user and diversion risk;
- obtaining licenses, permits or other authorizations where required;
- requiring end-use or compliance assurances; and
- retaining appropriate transaction and compliance records.

Endace may decline, suspend or cancel a transaction, shipment, download, service or access request where it identifies a compliance concern, cannot complete satisfactory due diligence, or determines that an authorization is required and has not been obtained.

Customer and partner responsibilities

By purchasing, accessing, using, transferring, reselling or otherwise dealing with Endace products and technology, customers and partners must:

- comply with all applicable export control, sanctions, customs and trade laws;
- not export, re-export, transfer, release or provide access contrary to applicable law or the terms of an Endace agreement;
- not supply Endace products and technology to a prohibited or restricted country, territory, person or entity, or for a prohibited end use;

- not use Endace products and technology in connection with nuclear, chemical or biological weapons, missile systems, unlawful military activity, terrorism, human rights abuses, or any other prohibited activity;
- not evade, circumvent or facilitate the circumvention of trade restrictions;
- obtain all required licenses, permits and governmental approvals before proceeding;
- provide accurate and complete information requested by Endace regarding the purchaser, consignee, end user, destination and intended end use; and
- ensure that their employees, contractors, customers and downstream recipients comply with equivalent requirements.

Endace may require a customer, partner or end user to complete an end-use statement, provide supporting documentation or participate in additional due diligence before Endace proceeds with a transaction or enables access.

Destinations, restricted parties and end uses

Trade restrictions change frequently and may be comprehensive, selective, country-based, sector-based, transaction-specific or targeted at particular individuals and entities. For that reason, this policy does not publish a fixed list of prohibited countries or parties.

Endace evaluates transactions against applicable laws and authoritative sources in effect at the relevant time. These will include:

- New Zealand Ministry of Foreign Affairs and Trade export controls;
- U.S. Office of Foreign Assets Control sanctions programs;
- U.S. Export Administration Regulations;
- U.S. International Traffic in Arms Regulations;
- U.S. Consolidated Screening List; and
- United Nations Security Council Consolidated List.

Other national or regional laws may also apply depending on the origin of an item, the parties involved, the destination, the route, the currency, and the proposed end use. The absence of a country or person from one list does not mean that a transaction is permitted.

Due diligence and warning signs

Endace expects customers and partners to conduct reasonable, risk-based due diligence. A transaction must not proceed where information is incomplete, inconsistent or suspicious, or where there is reason to believe that Endace products and technology may be diverted.

Warning signs may include:

- a party whose name or address resembles an entry on a restricted-party list;
- reluctance to identify the end user, destination or intended use;
- an end use that appears inconsistent with the recipient’s business or technical capability;
- unusual payment, routing, freight-forwarding, delivery or packaging arrangements;
- refusal of customary installation, training or support;
- a purchaser or end user with limited or unverifiable business information; or
- a request to alter documents, descriptions or destinations in a way that could conceal the true transaction.

If a warning sign arises, the transaction must be paused and referred to Endace for review. No shipment, transfer, download, service or access may proceed until the concern has been resolved and any required authorization has been obtained.

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Cooperation and records

Customers and partners must retain records required by applicable law and provide Endace with information reasonably requested to verify compliance. They must also cooperate with lawful governmental enquiries and with Endace compliance reviews relating to Endace products and technology.

Reporting concerns

Anyone who becomes aware of a potential export control or sanctions concern involving Endace products and technology should stop the relevant activity and promptly contact export@endace.com. Endace will review concerns in good faith and take appropriate action.

Changes to this policy

Endace may update this policy from time to time to reflect changes in law, regulation, guidance or business practice. This policy is a statement of Endace's compliance approach and does not constitute legal advice. Customers and partners should obtain independent advice about the requirements that apply to their circumstances.

This policy was last updated on 22 October 2026.

Disciplinary Action

Breaching export control and sanctions policies can result in severe legal, financial, and operational enforcement actions across major global jurisdictions for Customers and Partners.

Breach of this policy by Endace staff may result in disciplinary action. Depending on the nature of the unsatisfactory performance, misconduct or their severity, a team member may be subject to disciplinary action including, corrective counselling, disciplinary meeting/s warnings, or termination.

Version History

Version	Date	Reason
0.1	22 Oct 2026	Initial Draft
1	6 Nov 2026	Release of policy