

ITC Economic Sanctions Compliance Policy

1. Purpose

The IntelliCAD Technology Consortium (the “ITC”) is committed to compliance with laws, rules, and regulations applicable to our work around the world. In all we do, the ITC adheres to the highest levels of ethics and integrity, avoiding even the appearance of impropriety.

This Economic Sanctions Compliance Policy (the “Policy”) reflects our expectations regarding compliance with economic sanctions laws, rules, and regulations applicable to the ITC. As such, this Policy applies to all ITC employees, officers, directors, and managers (collectively, “ITC Personnel”) as well as ITC contractors and subcontractors.

2. Policy Statement

The United States has implemented laws, rules, and regulations imposing economic sanctions on certain individuals, entities, industry sectors, regions, and countries on the basis of national security and foreign policy considerations. Moreover, many of the countries in which the ITC may engage in activities have their own laws, rules, and regulations imposing economic sanctions, which may be similar though not identical to U.S. economic sanctions. **We require ITC Personnel to fully comply with all applicable economic sanctions laws, rules, and regulations and related laws of other relevant jurisdictions.**

Failure to comply with applicable economic sanctions laws may result in serious penalties, including imprisonment and fines for individuals, and large fines as well as significant reputational damage for entities. ITC Personnel who violate this Policy or applicable economic sanctions laws could be subject to discipline, up to and including termination.

2.1. Economic Sanctions Restrictions.

The ITC will screen all counterparties and perform due diligence safeguards, including using IP geolocation and regularly consult with outside counsel, to ensure that the ITC does not violate applicable economic sanctions laws, rules, and regulations.

To ensure compliance with these applicable economic sanctions laws, rules, and regulations, and allow for legal advice to be obtained where necessary and appropriate, you must consult with the President before taking any steps in pursuit of or engaging, directly or indirectly, in any transaction related to the ITC business in, to, or with:

- 2.1.1. [any country or region targeted by economic sanctions of any applicable jurisdiction](#), as they change from time to time, including any of the following countries or regions: Iran, North Korea, Venezuela, Syria, Afghanistan, Cuba, Russia, Belarus or the Crimea, Donetsk and Luhansk regions of Ukraine;
- 2.1.2. a person who appears on, or is acting on behalf of another person who appears on, the [List of Specially Designated Nationals & Blocked Persons](#) (SDN List), the Sectoral Sanctions Identifications (SSI) List, or Foreign Sanctions Evaders List maintained by the Office of Foreign Assets Control of the U.S. Department of the Treasury, or any other applicable list of sanctioned, embargoed, blocked, criminal, or debarred persons maintained by any U.S. or non-U.S. government, the European Union, Interpol, the United Nations, the World Bank, or any other public international organization relevant to our business, as they change from time to time (collectively, “Sanctions List”);
- 2.1.3. an entity that is 50% or more owned, individually or in the aggregate, directly or indirectly, by, is controlled by (including without limitation by virtue of such person

being a director or owning voting shares or interests), or acts, directly or indirectly, for or on behalf of, any person or entity on a Sanctions List; or

- 2.1.4. a person otherwise subject to any sanctions, suspensions, embargoes or debarment by the U.S. government or any other relevant government or public international organization.

The ITC engages with certain contractors and subcontractors providing software development and IT support services who may be citizens of Russia. The ITC requires all contractors and subcontractors to complete a periodic Certification of Compliance confirming their adherence to this Policy and all applicable economic sanctions laws, rules, and regulations.

In particular, all ITC Personnel and ITC contractors and subcontractors are prohibited – other than as specifically authorized by the ITC – from (1) sharing ITC software directly or indirectly with any individual or entity located in the Russian Federation; and/or (2) otherwise providing IT support services or cloud-based services to or for the benefit of any person located in the Russian Federation in connection with the use of ITC software or their engagement with the ITC more broadly.

Moreover, ITC contractors, subcontractors, or other persons located in Russia are prohibited from accessing the ITC servers located in the United States. ITC software located on U.S.-based servers is further prohibited from being transferred to anyone located in Russia, including ITC contractors and/or subcontractors located in Russia. The ITC shall implement IP geolocation analytics to track access to its servers and software and prevent such access by individuals located in Russia (or other countries targeted by relevant U.S. economic sanctions).

3. Recordkeeping

The ITC is expected to make and keep complete and accurate books, records and accounts regarding this Policy. Under applicable U.S. regulations, the ITC is required to maintain a full and accurate record of each such transaction engaged in for at least 5 years after the date of such transaction.

4. Certification & Training

Certain ITC Personnel may be required to attend economic sanctions training and to execute an annual compliance certificate certifying that they understand and have complied with this Policy. See **APPENDIX A:** The ITC's President will determine which ITC Personnel will be subject to this requirement.

5. Responsibility for this Policy

The ITC's Board of Directors has appointed the President to oversee the administration of this Policy and to report directly to the Board of Directors regarding the development and implementation of this Policy. The President shall report credible concerns regarding violations of laws, regulations, or rules or significant violations of this Policy to the Board of Directors. Furthermore, any substantive revisions to this Policy shall require the approval of the Board of Directors. The President will be supported by outside counsel, as necessary and appropriate.

6. Review & Updates

The President is responsible for taking appropriate steps to ensure that this Policy and associated procedures are followed and to evaluate the Policy's effectiveness in the context of the ITC's business operations. In this regard, the President, in consultation with outside counsel, will conduct periodic reviews to assess compliance with this Policy and will review the substance of the Policy annually to ensure that the Policy is up to date with regard to all applicable laws, regulations and internal procedures and that it adequately identifies and mitigates potential export control and economic sanctions risks associated with any changes to the ITC's operations.

7. Questions & Reports

- 7.1. **Questions:** Sanctions laws, rules, and regulations are constantly evolving and may vary among jurisdictions. As such, it is critical to consult with the President with regard to any questions relating to application of this Policy to the ITC's activities.
- 7.2. **Reporting:** The ITC expects all ITC Personnel to take steps to prevent a violation of this Policy. This includes identifying and raising potential issues before they lead to problems and seeking additional guidance when necessary. The ITC encourages all ITC Personnel to discuss their concerns or questions regarding potential instances of misconduct with the President. Retaliation against anyone who has made a good-faith report of a possible violation of law, or any the ITC policy is strictly prohibited and will result in disciplinary action.

8. Waivers & Violations

Waiver of any provision of this Policy requires prior written approval from the President. If, in its sole discretion, the ITC determines that a violation of this Policy has occurred, appropriate disciplinary action will be taken promptly, up to and including termination without notice and for cause.

APPENDIX A:

Annual Employee Certification
ECONOMIC SANCTIONS POLICY
ACKNOWLEDGMENT & CERTIFICATION

I acknowledge that I have received, reviewed, fully understand and have and will continue to comply with the Economic Sanctions Compliance Policy (the “**Policy**”) as well as all applicable economic sanctions laws, rules, and regulations.

If I have any questions or concerns about the Policy or if I become aware of or suspect a violation of the Policy or economic sanctions laws more generally, I will contact the President.

Signature:

Printed Name and Title:

Date: