

FOREIGN TRADE AND EXPORT CONTROL KOSPEL SP. Z O.O.

Aim

Any company that engages in exports is required to ensure compliance with the country's export control regulations. For the purpose of ensuring compliance with export control legislation in KOSPEL's activities, this guideline describes the procedure for business operations in relation to the relevant areas of law (domestic and international).

Person Responsible for Exports

The management of the Kospel Company is responsible for the legally compliant execution of exports. The Vice President of the Customer Division is in charge of exports, so overall responsibility for export control under foreign trade law resides with him/her.

Responsibilities for Export Control and Customs

The person responsible for exports defines the responsibilities for export control and customs within Kospel. He/she is the central contact person for all queries relating to export control and customs regulations, as well as for the relevant authorities. In the event of conflicts in transactions that are relevant to export control or customs, he/she is authorized to make decisions and issue instructions. This includes the stop function and direct intervention in these transactions. The Export Department is responsible for ensuring the technical and organizational implementation of export control and customs procedures, and for monitoring compliance with the stipulations as given by the person responsible for exports.

Process Checks

All business transactions must be recorded and processed exclusively in the respective ERP system.

Goods-Related Export Control

All goods, i.e. parts, software and technology, must be checked for authorization obligations.

Embargoes

In the case of business contacts with natural and legal persons, groups, companies and entities from embargoed countries, the embargo regulations must be observed. Export to any of these countries may only be carried out after approval from the person responsible for exports.

Services

Services are also subject to export control. This may include technical assistance relating to repair, development, manufacture, installation, testing, maintenance or any other technical service, and may take the form of instruction, training, transfer of practical knowledge, skills or consultancy.

International Business Trips

Business trips are also subject to export control and customs regulations, and must be clarified in advance with the relevant supervisor. This applies in particular to business trips to embargoed countries and the transfer of technical expertise that is relevant to export control regulations.

Procedure for Authorization Obligation

If a planned transaction is subject to authorization, the required authorization application is submitted to the relevant authority. Authorization procedures are regulated at national level and must be followed.

Application of the Different Areas of Law

Each planned export involves several areas of law. The task of the Export Department is to take into account the requirements of the individual areas of law.

Initial and Ongoing Training

As part of staff selection, the person responsible for exports must ensure that the Export Department employees entrusted with tasks relating to export control regulations always possess the up to date knowledge necessary for their area of responsibility.

Documentation

All documents relating to a given transaction are stored together electronically. The documents are stored for at least ten years in a read-only format.