



VENTURE CORPORATION LIMITED

EXPORT CONTROL COMPLIANCE POLICY

Last Updated: 16 April 2018

Please note that the information provided below is for general information purposes only and to get the reader started in understanding its export control obligations. For non-Venture readers, do note that exportation of restricted goods is a complex area and the reader is solely responsible for seeking his/her own advice and ensuring your compliance in relation to such matters.

1. Introduction

Venture is committed to complying with the applicable global laws and regulations relating to export controls. As part of this compliance effort, Venture's agreements contain provisions requiring its customers, suppliers and partners to ensure compliance with these laws and regulations.

It is of the upmost importance to Venture that we follow the laws and regulations governing the movement of goods, information and technologies that are controlled under any export control laws and regulations. this will allow Venture to maintain its good corporate citizenship status, avoid inadvertent violations, costly errors, and the possible disruption of business.

2. Who Does this Policy Apply to?

This policy applies to all Venture employees, whether contracted on a full-time or a part-time basis (collectively, "**Venture Personnel**"). All Venture Personnel will receive export training including the reading of this policy statement and be given the opportunity to ask questions.

In addition, this statement will be communicated to all customers, suppliers and other business partners such as contractors, consultants, freight forwarders, distributors, sales representatives or any persons doing business with Venture or on Venture's behalf, as a condition of doing business with Venture (collectively, "**Business Partners**"). Venture seeks to strong support of its Business Partners to not only maintain full compliance with applicable export control laws and regulations, but also fully cooperate with Venture to provide us with export control information specific to any goods, information and technologies supplied or transferred to Venture.

3. Key Policy Principles

No transactions are to be conducted by or on behalf of Venture contract to applicable export control laws and regulations, *including without limitation*, the U.S. Export Administration Regulations and the International Traffic in Arms Regulations, the Singapore Strategic Goods (Control) Act and/or the Malaysia Strategic Trade Act.

At a minimum, products manufactured by Venture ("**Products**") cannot be exported or re-exported to certain prohibited destinations, to prohibited users, or for prohibited uses as discussed below. In this regard, a license from the relevant bodies administering the export controls may be required in order for Venture to export or reexport the Products even to friendly countries. Further, Products specially designed or modified for defense applications will require a license for export to any destination.

Technical information that may be provided to any Venture entity, such as drawings, diagrams, user manuals, etc., ("**Technical Information**") are also subject to applicable export control laws

and regulations of the receiving country. Thus, exports or reexports of Technical Information must be made only in compliance with applicable export control laws and regulations, which may require an export license for certain information. An “export” includes giving a person who is a non-resident of the country of export, such as a foreign-national employee or visitor, access to such information.

Prohibited Destinations:

Products and Technical Information may not be exported to the following destinations or entities of: Cuba, Iran, Libya, North Korea, Sudan or Syria. This list is subject to change and you must comply with the list as it exists at the applicable time.

Prohibited Users:

Products and Technical Information cannot be resold, reexported, or transferred to any prohibited persons or entities included on the Specially Designated Nationals List, Denied Persons List, Unverified List, Entity List, AECA Debarred List, and Nonproliferation Sanctions List.

Prohibited Uses:

Products may not be used without the appropriate government or licensing body of the receiving country authorization for:

- (a) Designing, developing, fabricating nuclear weapons or nuclear explosive devices; or devising, carrying out, or evaluating nuclear tests or nuclear explosions;
- (b) Designing, assisting in the design of, constructing, fabricating, or operating facilities for the chemical processing of irradiated special nuclear material, for the production of heavy water, for the separation of isotopes of any source and special nuclear material, or specially designed for the fabrication of nuclear reactor fuel containing plutonium;
- (c) Designing, assisting in the design of, constructing, fabricating, furnishing or modifying equipment for the fabrication of chemical or biological weapons, chemical precursors, viruses, viroids, bacteria, fungi or protozoa;
- (d) Designing, assisting in the design of, constructing, fabricating or furnishing equipment for components specially designed, modified or adapted for use in such facilities;
- (e) Designing, developing or producing rockets or missiles; and/or
- (f) Training personnel in any of the above activities.

4. Venture’s Commitment to Export Control Compliance

Venture is committed to complying with all applicable laws and regulations of the Singapore, Malaysia, United States, and every country in which it conducts business. Non-compliance with legal provisions can subject Venture as well as its Business Partners to criminal and civil penalties, the seizure of assets, and the denial of import or export privileges.

Venture is dedicated to providing sufficient time, funds and personnel to ensure compliance. Export control requirements depend on the knowledge of the end-use, end customer, ultimate destination and other circumstances relating to our or the customer’s export activities in order to prevent export infringements. These requirements also include catch-all clauses related to nonproliferation and the prohibition to proceed with any transaction with the knowledge or the reason to believe it may constitute a violation of the applicable provisions.

In addition, Venture has established internal risk-focused review process for all new customers, in which we document and verify the identity of Business Partners and end customers, and assess the plausibility of the product’s end-use. Before confirming any orders from unknown entities,

Venture demands detailed information from such unknown entities in order to perform, *inter alia*, export control related identity and compliance checks.

5. Your Responsibilities

At Venture, export control compliance, along with our anti-bribery and anti-corruption Code of Conduct, is a key aspect of our Business Ethics.

As a Venture Personnel

Venture Personnel must have at least a general understanding of export control regulations. In particular, Venture employees with export responsibilities are required to have a working knowledge of export control laws and regulations, especially those governing their specific job functions, as well as a working knowledge of Venture's export control policies and procedures. In particular:

- (a) The global sourcing (GSBM) and local procurement functions must be fully aware of the export control status of all materials and components acquired externally for production purposes, and must accurately communicate and input such information within Venture's internal IT systems.
- (b) The Total Customer Satisfaction directors and managers and the shipping and logistics function must pay particular attention to ensure that any export of Products which are flagged as containing controlled materials, components or Technical Information are exported only in compliance with applicable export compliance laws and regulations (i.e., not exported to prohibited destinations or users, or for prohibited uses).
- (c) All research and development and engineering personnel, as well as sales representatives must pay particular attention when releasing Technical Information outside the organization.

Any Venture Personnel who has knowledge of facts or incidents which he or she believes may violate applicable export control relations, whether intentional or accidental, is required to report the matter promptly to the Export Compliance Officer.

As a Business Partner

We expect our Business Partners to strictly observe all applicable laws and regulations concerning the export and import of goods, services and information. Venture requires that any party, we conduct business with, becomes familiar with and ensures compliance with applicable export regulations, and any relevant export or import regulations in the countries, in which it operates.

From time to time Venture will send communications on important regulatory developments in order to provide our Business Partners with additional knowledge and increase awareness on certain topics.

6. Export Control Record Retention

Within Venture, we will maintain all export-related records for at least 5 years.



7. Questions?

All questions regarding export compliance and how it impacts your job as a Venture Employee, or the way you do business with Venture as a Business Partner, as well as any question concerning the legitimacy of any transaction with Venture, violation or potential violation by Venture, must be immediately referred to our Group Export Compliance Officer.