Höganäs

Höganäs 2023-02-01

Statement of Compliance with Export Control Regulations

One of the fundamental policies adopted by the Höganäs Group (hereinafter referred to as "Höganäs") is to abide by applicable national and international export control laws and regulations including those of the United States, the European Union, the United Kingdom and any other applicable export control laws and regulations, in order to fulfill the export control obligations and responsibilities.

For Höganäs to ensure compliance with applicable export control laws and regulations, an internal trade compliance program has been established.

Höganäs verifies and screens transaction parties involved in its business operations, including but not limited to customers, suppliers, and partners, so as to comply with applicable export control laws and sanction regulations.

Höganäs conducts export control classifications for its products and technologies and obtains export control licenses when necessary. Höganäs also maintains close contacts with export control legal and compliance professionals to keep abreast of relevant policy information and seek guidance where necessary.

Any situation where Höganäs believes that the products, technologies, and services to be exported, whether physical or intangible, may be used for developing or manufacturing weapons of mass destruction, their delivery systems, unauthorised conventional military equipment or any other prohibited end-use pursuant to applicable laws and regulations that may jeopardise the national or regional peace or stability or fall into the hands of terrorist organisations, Höganäs will, based on the principle of "catch-all" control, implement relevant export control measures and refrain from exporting such products, technologies, and services.

Höganäs has set up a Trade Compliance Department which is responsible for developing, implementing, and improving Höganäs's export control and relevant sanctions compliance policies, systems, and processes; and driving the execution of these policies, systems, and processes across all applicable business units and corporate functions. In addition, a Trade Compliance Council has been established to guide and recommend and set further policies on major trade and customs compliance matters and solutions.

Höganäs has clearly defined the responsibilities of relevant corporate functions, developed and implemented relevant guidance documents, established a recordkeeping system, strengthened training and development of professional knowledge and export control skills for its employees and the management team, and conduct periodic internal assessments and audits of its trade compliance program.



This statement applies to all branches and subsidiaries of the Höganäs Group.

Höganäs will routinely review this statement and revise it in accordance with relevant laws and regulations.

Yours sincerely,

HÖGANÄS AB

Katarina Jarring

SVP General Counsel

Höganäs AB

For any questions, please contact tradecompliance@hoganas.com