

Purpose and Scope

Export and import laws regulate and, in certain cases, prohibit the export, re-export, and import of software and technology to specific countries/regions, organizations, companies, or individuals.

Furthermore, numerous countries and organizations are relevant to Camunda operations, such as Germany, the European Union (EU), the United States (US), the United Kingdom (UK), the United Nations (UN), and Singapore, that impose strict controls on trading with countries/regions, organizations, companies, or individuals in order to uphold international peace and security or in response to perceived unfriendly or threatening entities.

Camunda aims to uphold the highest standards of ethics and compliance in its global operations, fostering long-term sustainable growth while respecting international trade laws and regulations.

This policy also applies to the provision of cloud-based services, software-as-a-service (SaaS), source code, encryption features, and technical support. These elements may be considered controlled exports under applicable regulations.

End User and Use Restrictions

Camunda will not purposely export, re-export, or transfer its product or services to individuals, entities, or countries that are subject to sanctions or trade restrictions or pose an elevated export control or sanctions risk for Camunda.

This involves restricting the access of products and services to entities and individuals with whom transactions are prohibited under applicable export control and sanctions laws, including those listed on any applicable sanctioned party lists (e.g., European Union Sanctions List, U.S. Specially Designated National (SDN) lists, U.S. OFAC Sanctions List, UK Sanctions List, United Nations Security Council Sanctions, and Singapore's Terrorism (Suppression of Financing) List).

There are certain countries on Camunda's non-compliant and blocked countries list, such as North Korea, Cuba, Iran, Syria, etc., with whom we do not engage in commercial relationships.

Transactions involving restricted end-uses, such as military end-uses that could involve arms embargoes or similar restrictions, certain civil nuclear end-uses, or industry-specific end-use restrictions, may necessitate obtaining a license, authorization, or other relevant documentation before proceeding with the business engagement.

Camunda prohibits indirect transfers, including routing transactions or services through third parties, resellers, or affiliates, to circumvent sanctions or export restrictions. The Supplier or Partner must not divert, resell, or otherwise re-transfer Camunda's software or services in violation of applicable laws.

Compliance with Sanctions and Trade Regulations

Before entering into a commercial agreement with Business Partners - the Ethics Team at Camunda conducts export screenings. This screening involves a comprehensive review to assess the following:

- i) Whether there is a requirement for special export licenses for our software.
- ii) Whether the Business Partner or its board members are listed on any sanctions list.
- iii) Whether the end-use or end-user for which the Camunda software will be used is in a sanctioned or embargoed country.

This evaluation ensures our compliance with international trade regulations. The export screening is considered unsuccessful if any matches are found on the sanction list or with a restricted country/purpose. Consequently, the Business Partner is red-lighted, and the opportunity is not pursued further.

Additionally, to provide further safeguards, the commercial agreements and terms and conditions with Business Partners include export clauses to ensure compliance with applicable trade laws, sanctions, and export controls.

Due to dynamic updates in the sanctions regime, our internal policies are updated as necessary to adapt to changing in laws, regulations, and business requirements.

Further Information

Should you have any further questions or queries, please feel free to contact us at compliance@camunda.com.