EXPORT CONTROL POLICY

Introduction

ADVANCED ENGINEERING GROUP (the "Company"), based in the United Kingdom, is committed to complying with all applicable export control laws and regulations. This policy outlines our commitment to ensuring that our business activities adhere to the strict standards set by UK and international export control laws to prevent unauthorized exports of controlled goods, technology, and information.

Scope

This policy applies to all employees, contractors, suppliers, and business partners of ADVANCED ENGINEERING GROUP. It covers all products, services, software, technology, and information subject to export control laws.

Company Structure

Headquartered in SILSDEN, UK, ADVANCED ENGINEERING GROUP operates internationally through various legal entities, including:

- **ADVANCED ACTUATORS LIMITED**
- **ADVANCED COMPONENTS LIMITED**
- **ADVANCED DRIVES**

Policy Statement

Compliance with Export Control Laws:

Advanced Engineering Group is dedicated to complying with all applicable UK and international export control laws and regulations, including but not limited to:

- The UK Export Control Act 2002
- The UK Export Control Order 2008
- The EU Dual-Use Regulation
- The US Export Administration Regulations (EAR)
- Other relevant international regulations as applicable

Controlled Goods and Technology:

The Company will identify and classify all products, services, software, technology, and information subject to export controls. This includes military and dual-use items, as well as technology and software that may require export licenses.

Export Licenses and Authorizations:

The Company will obtain all necessary export licenses and authorizations before exporting controlled goods, technology, or information. This includes ensuring compliance with conditions and limitations specified in licenses and authorizations.

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Due Diligence and Screening:

Advanced Engineering Group will conduct due diligence and screening of all transactions, customers, and partners to ensure compliance with export control regulations. This includes screening against denied parties lists, embargoed countries, and other restricted entities.

Training and Awareness

Training Notes are attached to this Policy and should be read by all employees; anyone requiring any further guidance or external training should notify your line manager or a Director of the company

Record Keeping and Documentation:

Advanced Engineering Group will maintain accurate records of all export transactions, including licenses, shipping documents, and communications related to export control compliance. Records will be retained for the period required by applicable laws and regulations.

Internal Controls and Audits:

The Company will implement internal controls to monitor and enforce compliance with export control laws. Regular audits and assessments will be conducted to ensure adherence to this policy and to identify and address any compliance issues.

Reporting and Incident Management:

Employees are required to report any suspected violations of export control laws or this policy to the Directors immediately. The Company will investigate all reports and take appropriate corrective actions.

Consequences of Non-Compliance:

Non-compliance with export control laws and this policy may result in severe consequences, including disciplinary action, termination of employment, and legal penalties. The Company will take all necessary steps to prevent and address violations.

Implementation and Accountability

The Directors are responsible for the implementation, oversight, and enforcement of this policy. All employees, contractors, suppliers, and business partners are expected to comply with this policy and cooperate with compliance efforts.

Review and Update

This policy will be reviewed annually and updated as necessary to ensure its continued relevance and effectiveness in promoting export control compliance.

This policy has been endorsed and approved by:



Andrew Peace
Managing Director

Date: 1st June 2026

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TRAINING NOTES

Introduction

Export controls are legal measures to regulate and restrict the export of certain goods, technologies, and services to ensure they are not used for purposes that could threaten national and international security. Compliance with export control laws is critical for Advanced Engineering Group to avoid legal penalties, financial losses, and reputational damage. These training notes provide essential information to help employees understand and comply with export control regulations.

Key Concepts

- **Export Control Regulations**: Legal frameworks established by governments to manage the export of sensitive items. For the UK, these include the UK Export Control Act, the EU Dual-Use Regulation, and various international agreements like the Wassenaar Arrangement.
- **Controlled Items**: Goods, technology, software, and services that are subject to export control regulations. These typically include military items, dual-use goods (items with both civilian and military applications), and sensitive technologies.
- **Export Licenses**: Official authorizations required to export controlled items. These licenses specify the conditions under which the items can be exported.
- **End-Use and End-User Checks**: Verifications to ensure that exported items are not intended for unauthorized uses or recipients. This includes screening customers and partners against denied parties lists and ensuring that the items are not diverted to illicit end uses.

Employee Responsibilities

- **Awareness and Understanding**: Employees must be familiar with the company's export control policies and the relevant regulations. Regular updates will be provided to ensure current knowledge.
- **Classification of Items**: Employees involved in the design, manufacturing, and sale of products must determine if items are controlled under export regulations. This involves consulting control lists and seeking advice from the Directors when necessary.
- **Documentation and Record-Keeping**: Accurate records of all export transactions must be maintained. This includes export licenses, shipping documents, end-user certificates, and correspondence with regulatory authorities.
- **Due Diligence**: Conduct thorough due diligence on customers, intermediaries, and end-users to ensure compliance with export control laws. This includes verifying the legitimacy of the parties involved and the intended use of the exported items.
- **Reporting and Escalation**: Employees must report any suspected violations of export control regulations to the Directors immediately. This includes any unusual requests, suspicious behaviour, or discrepancies in documentation.

Export Control Compliance Procedures

- **Product Classification**: Determine whether products, technology, or services are subject to export control regulations. Use control lists and classification tools and consult with the Directors if needed.
- **License Application**: Identify if an export license is required for the transaction. If necessary, prepare and submit the license application to the relevant authorities, ensuring all required information is accurate and complete.
- **Screening and Verification**: Screen all parties involved in the export transaction against denied parties lists, including the HM Treasury Sanctions List, the EU Consolidated List, and the US Denied Persons List. Verify the end-use and end-user of the items.
- **Shipping and Documentation**: Ensure all shipments comply with the terms of the export license. Maintain comprehensive records of the export transaction, including invoices, shipping documents, export licenses, and end-user certificates.
- **Audits and Reviews**: Conduct regular audits of export control procedures to ensure compliance. Review and update policies and procedures as necessary to reflect changes in regulations or business practices.

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Penalties for Non-Compliance

Non-compliance with export control regulations can result in severe penalties, including:

- Fines and monetary penalties
- Revocation of export privileges
- Criminal charges and imprisonment
- Damage to the company's reputation and business relationships

Conclusion

Compliance with export control regulations is critical for the security, legal, and financial well-being of Advanced Engineering Group. All employees play a vital role in ensuring adherence to these regulations. By understanding and following the company's export control policies and procedures, we can avoid legal penalties and maintain our commitment to ethical business practices.

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