



Silicones
Lube oil additives
Chemicals

Export Control Compliance Policy Statement “BRB Group” (the group of companies organizationally connected, directly or indirectly, with BRB Holding B.V., including affiliated companies, subsidiaries and participations).

It is BRB Group's express policy as a Supplier to fully comply with all applicable (UN, EU, US and other) Export Controls and Sanctions (trade & financial embargoes), hereafter: "export controls".

BRB Group does so, not only with a view to its responsibilities as a Supplier, but also to be best positioned - under power of attorney - to advise and support its clients regarding license application and necessary filings, license management, destination & end use(r) controls, screening and recordkeeping.

Export control laws restrict - inter alia - the shipment, transfer and/or transmission [(re-)export] of certain items (goods, parts, software, data, technology and services) from the Netherlands and other countries which within the BRB Group, to and through third countries and certain designated companies and persons. The (re-)export of certain items is regulated for reasons of national security, foreign policy, prevention of the spread (proliferation) of weapons of mass destruction and for competitive trade reasons. Prior written authorization (an export license) from one or more government agencies may be required to carry out any (re-)export, unless an exemption applies. Strict adherence to export control laws and regulations is required from every employee and all affiliates within the BRB Group.

Failure to comply could result in civil or criminal penalties, including but not limited to fines, imprisonment, loss of export privileges, debarment, revocation of previously approved licenses, seizure and forfeiture of goods. Such penalties may be imposed on BRB Group, certain entities within the BRB Group, individuals employed by or otherwise affiliated with BRB Group (e.g. partners in the international supply chain), or any combination thereof. Because of the fundamental importance of complying with all applicable export controls, employees who knowingly violate such controls will be subject to appropriate disciplinary action, up to and including disciplinary measures.

BRB Group designated an Export Control Officer (ECO). The ECO has primary responsibility for ensuring compliance with all applicable export controls. The ECO is also responsible for the development, implementation and updating of a companywide Export Control System, regularly training of employees on export controls and monitoring their compliance with export controls. Any employee aware of or suspecting questionable conduct or potential violations of export control laws should immediately report these concerns to the ECO or to the General Management. General Management and the ECO have an obligation to investigate and address reported concerns.



BRB Group will not retaliate against employees or (other) individuals for asking questions, raising concerns about compliance issues or reporting possible misconduct.

Sound export control practices underscore our commitment to ethical business behavior and compliance with applicable laws and regulations.

BRB Group, March 2016

