

"Policy and Procedures for Preventing Diversion of U.S. Technical Data to Sanctioned Persons, Entities, or Countries"

Company: DAS TECHNOLOGY SERVICES LLC

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Key Elements of Our Policy and Procedures Include:

1. Export Compliance Policy

- We have an established **Export Control s Sanctions Compliance Policy** that outlines:
 - Compliance with **U.S. Export Administration Regulations (EAR)** and **Office of Foreign Assets Control (OFAC)** requirements.
 - Prohibitions against sharing controlled technical data with restricted or embargoed regions.

2. Restricted Party Screening (RPS)

- We conduct **automated screening** of all subcontractors, partners, and relevant parties against:
 - OFAC SDN list
 - BIS Entity List
 - Denied Persons List
 - Other applicable international sanctions lists

3. Access Control and Data Segregation

- T-Mobile technical data is **stored and accessed within secure, geo-fenced**

environments.

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- Access is limited to authorized personnel who have been verified as compliant with export control regulations.

4. Subcontractor and Third-Party Controls

- All subcontractors must undergo compliance checks and agree contractually to:
 - **Not re-export or share any controlled data** outside permitted jurisdictions.
 - Abide by **U.S. export control laws**, regardless of their country of operation.

5. Employee Training and Awareness

- Team members receive **annual export control compliance training**, including modules on:
 - Sanctioned countries/entities
 - Handling of controlled technical data
 - Escalation and reporting procedures

6. Incident Monitoring and Escalation Protocols

- Any suspected or actual breach of export control rules is immediately escalated to compliance and legal teams.
- We have clear procedures for **reporting to relevant authorities**, if necessary.

7. Periodic Audits and Policy Reviews

- Internal audits verify that controls are effective and up to date with current U.S. laws and sanctions.
- Policies are reviewed at least **annually** or upon major regulatory changes.