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Additionally, both the Department of Treasury and the Department of State regulate and control other types of export-related technology and product transfers and transactions. The <u>Office of Foreign Assets Control</u> (OFAC) of the U.S. Department of the Treasury administers and enforces economic sanctions against certain countries and regimes, terrorists, and other threats to U.S. national security, foreign policy or economic interests.

It is Fenix Alliance policy to comply with EAR, OFAC rules, and the international <u>Wassenaar Arrangement</u> and to proceed with the proper classification of its products and services (which results in the determination of an ECCN – Export Control Classification Number) so that Fenix Alliance products can be easily and readily exported to non-embargoed destinations while maintaining a high level of compliance.

Fenix Alliance software products either are not subject to the EAR thus not on the Commerce Control List and have no ECCN, or they are EAR99, or are 5D992 Mass Market eligible for self-classification by Fenix Alliance and may be exported to non-embargoed countries without a license as No License Required (NLR).

A few of the products have an ECCN assigned that may or may not require a license, and one should consult the EAR or legal counsel to determine the appropriate license type and eligible countries for export purposes.

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