

## Export Compliance Attestation

**To:** Immigration Solutions Group

**Subject:** I-129 Verification – Petition for a Nonimmigrant Worker to Temporarily Work or Receive Training in the US

**Regarding:** *Naga Venkata Someswara Rao Gonaboyina*

As part of the I-129 Verification Process, HCL must determine if the employee shown above will be provided access to any US Export Restricted Technology or Technical Data while in the US. This includes both ITAR (International Traffic in Arms Regulations) military technology and EAR (Export Administration Regulations) restricted commercial/dual use technology. The following is a guideline to assist you in determining if an employee is working on export restricted technology:

Step 1 – If the technology or technical data is associated with the design, development, configuration, adaptation or modification of a military related item or application (i.e.; ITAR related technology), then it is export restricted (\*). Skip the remaining steps and mark option 2 in the Determination section at the bottom of this form. If not or you are not sure, go to the next step.

Step 2 - Contact the customer associated with the project to which the employee is assigned and ask them if the project related technology/technical data is export restricted. If the customer indicates the project is export restricted, have them identify the United States Munitions List (USML) Category per the ITAR or the Export Control Classification Number (ECCN) , per the EAR that applies (if known). Once you obtain the classification number, contact the HCL America Inc. Export Compliance Director (ECD) to confirm that the technology is export restricted. Based on the ECD response to you, skip the next step and complete the Determination section accordingly at the bottom of this form. If the customer does not know if the technology/technical data involved is export restricted, go to the next step.

Step 3 – Review the following list to determine if the technology or technical data the employee is working on is associated with any of the following:

- Nuclear related items and applications
- Space (i.e.; beyond the atmosphere of the earth) related items and applications
- Chemical (including testing/production/disposal equipment, protection and detection related devices, detonators, and explosives), Toxins, Microorganisms, Biotechnology and Biomedical Engineering
- Advanced Materials (e.g.; Tungsten, Titanium, Tritium, Ceramics, Graphites, Superconductors, Zirconium, Composites, Polymers, etc...) and related Materials Processing Technologies (certain high tech crucibles, centrifuges, valves, pumps, generators, dimensional inspection, bearing systems, isostatic presses, metal working machines, numerically controlled machines, etc...)
- Sensors and Sensor Technology (e.g.; acoustic systems, advanced optics, radar, magnetometers, high speed cameras, imaging devices/cameras, gravimeters, pressure sensors, magnetic/electric field sensors, velocity interferometers, etc...)
- Navigation, Avionics & Flight Control (e.g.; accelerometers, gyros, inertial systems, sonar navigation, actuators, etc...)
- Propulsion Systems, Rockets and Missile Systems (e.g.; aero/marine gas turbine engines, liquid/solid/hybrid rocket propulsion systems & engines, ramjet/scramjet/combined cycle engines, turbojet/turbofan engines, pulse jet engines, reentry vehicles, staging mechanisms, rocket stages, sounding rockets, liquid propellant tanks, composite blades and propfans, etc...)

- Telecommunications (e.g.; designed to withstand electromagnetic pulses, underwater communications, radio equipment operating in 1.5 – 87.5 MHz band or employing spread spectrum or ultra-wideband modulation techniques, digitally controlled radio receivers, radio direction finding equipment, optical cables/fibers, jamming equipment, passive coherent location systems, surreptitious interception devices, telemetering and telecontrol equipment, laser communications, digital transfer rates > 50Gbits/s, multi channel communications, optical switching equipment, power amplifiers, QAM techniques, switching using superconductive gates, etc...)
- Information Security Systems (i.e.; contains encryption functionality)
- Advanced Computer, Microelectronic Technology, Integrated Circuits and Microprocessors
- Laser and Directed Energy Systems
- Unmanned Air Vehicle (UAV) Subsystems
- Radiation Hardened Devices and Detectors
- Robotics
- Marine Applications, Submersible Vehicles, other items specifically designed for underwater use
- Advanced Electronics (e.g.; accelerators, acoustics, vacuum tubes, pulse generators, converters/inverters, signal/frequency analyzers & synthesizers, mass spectrometers, oscilloscopes, high voltage power supplies, solid state devices, substrates, switching devices, voice analysis, solar cells, microwave device, etc...)
- Crime Control, Law Enforcement Devices, Crime Science Laboratories, Polygraphs, and Fingerprint/Voiceprint Devices

If any of the above applies, contact the ECD to confirm that the technology or technical data is export restricted. Based on the ECD response, complete the Determination section accordingly at the bottom of this form. If none of the above applies or if the ECD response is that the technology or technical data is not export restricted, then mark option 1 in the Determination section at the bottom of this form.

**Determination of Export Restricted Technology:**

Based on the analysis above, please indicate your determination (mark either 1 or 2 with an "X"):

1. Employee will not be working on export restricted technology   x
2. Employee will be working on export restricted technology        (\*)

Comments: \_\_\_\_\_ (If any)

(\*) – A US export license may be required. Contact the HCL America Inc. Export Compliance Director (ECD) for guidance prior to permitting the employee's access to the restricted technology involved.

**Note:** The reporting manager must reassess the individual if his/her assigned responsibilities change to a different type of technology or if they are reassigned to another customer and notify HCL's Immigration Solutions Group accordingly if the export restriction determination would be impacted.

Reporting /Approving Manager Name **Rajee Kannan**

Signature   Rajee   Date 14-Dec-2022

Reference: Corporate Policy - **Immigration Form I-129: Release of Export Controlled Technology**  
Corporate Policy - **Export Compliance Manual**