EXPORT CONTROL COMPLIANCE RECORDS

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NaviFloor Robotics, Inc.

Last Updated: December 31, 2023

1. OVERVIEW AND SCOPE

- 1. This document details NaviFloor Robotics, Inc.'s ("Company") expo
- 2. The Company's autonomous mobile robots (AMRs) and associated

2. EXPORT CONTROL CLASSIFICATIONS

1. Primary Products and Technologies:
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NaviFloor AMR Platform (ECCN: 2B350)
-
TerrainMap(TM) Navigation Software (ECCN: 2D351)
-
FleetControl(TM) Management System (ECCN: 2D351)
-
LiDAR Sensor Integration Module (ECCN: 6A998)
2. Controlled Technical Data:
-
Proprietary terrain-mapping algorithms

2 -
Navigation system architecture specifications
-
Sensor fusion protocols
-
Sensor fusion protocols

3. COMPLIANCE PROCEDURES

Machine learning training datasets

Export Screening Process:

- Customer verification through Restricted Party Screening
- End-use and end-user certification requirements
-

Destination control statement implementation
<u>-</u>
Technical data transfer protocols
2. Internal Controls:
-
Quarterly compliance audits
-
Employee training program
-
Documentation retention system
-
Technology Control Plan (TCP) implementation

4. EXPORT LICENSES AND AUTHORIZATIONS

1. Active Export Licenses:
-
License D-23789: Advanced robotics systems to qualified EU entities
-
License D-23790: Technical data transfer to Canadian subsidiaries
-
License D-23791: Software exports to approved APAC distributors
2. License Exceptions Utilized:
-
TMP: Temporary exports for demonstrations
-
TSU: Technology and software unrestricted
-
RPL: Service and replacement parts

5. COMPLIANCE ACTIVITIES (2023)

1. Training and Education:
-
Annual export compliance training completed by 187 employees
-
Specialized training for engineering team (March 15, 2023)
-
Executive briefing on ITAR updates (June 30, 2023)
2. Audits and Reviews:
-
Internal compliance audit (Q2 2023)
-
External audit by Deloitte (September 2023)

6-
Technology control assessment (November 2023)
6. INCIDENT REPORTING AND RESOLUTION
1. Reported Incidents:
-
One (1) potential unauthorized technical data access (March 2023)
-
Resolution: Investigation completed; no actual unauthorized access of
-
Preventive measures implemented: Enhanced access controls
2. Voluntary Disclosures:
-

None filed during the reporting period

7. INTERNATIONAL TRANSACTIONS

1. Approved Export Destinations:					
-					
European Union (excluding restricted territories)					
-					
United Kingdom					
-					
Canada					
-					
Japan					
-					
South Korea					

8 - Australia
2. Restricted Markets:
Company maintains strict no-export policy to embargoed countries
Enhanced due diligence for sensitive markets
8. RECORDKEEPING
Export Transaction Records: -
Digital documentation system implemented

Five-yearretention policy		
-		
Quarterly backup and verification		
-		
Secure cloud storage with encryption		
2. Technical Data Controls:		
-		
Secure file transfer protocols		
-		
Access logging and monitoring		
-		
Data classification system		
-		
Regular security audits		

9. CERTIFICATION

The undersigned hereby certifies that this Export Control Compliance complete and accurate to the best of their knowledge and belief.

Dated: December 31, 2023
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James Wilson
Chief Financial Officer
NaviFloor Robotics, Inc.

Elena Martinez

Export Compliance Officer

NaviFloor Robotics, Inc.

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10. LEGAL DISCLAIMER

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