

## COMSIT – USA ADDENDUM (EN)

### 1. Purpose and Scope

This Addendum complements the global ComSIT Code of Conduct with U.S.-specific legal and regulatory requirements. It applies to all employees of ComSIT Inc., all U.S.-based business operations, and all suppliers or partners conducting business with or through the United States.

### 2. U.S. Export Control (EAR, ITAR, OFAC)

ComSIT complies with the Export Administration Regulations (EAR), International Traffic in Arms Regulations (ITAR), and OFAC sanctions. Prohibited activities include unlicensed exports, deemed exports, reexports of controlled items, and transactions with sanctioned parties (SDN List, Entity List).

### 3. Anti-Corruption (FCPA)

The Foreign Corrupt Practices Act prohibits bribery of foreign officials, improper payments, kickbacks, and falsified accounting records. Low-value, transparent hospitality is allowed under strict conditions.

### 4. Anti-Boycott Regulations

ComSIT must not participate in or support unauthorized foreign boycotts. Any boycott-related request must be reported to U.S. authorities.

### 5. U.S. Labor & Equal Employment Laws

We comply with Title VII, ADA, ADEA, FMLA, Equal Pay Act, and FLSA. Discrimination, harassment, and retaliation are strictly prohibited.

### 6. Workplace Safety (OSHA)

ComSIT ensures a safe workplace, proper training, incident reporting, and use of protective equipment as required by OSHA regulations.

### 7. Data Protection (CCPA/CPRA)

ComSIT Inc. complies with CCPA, CPRA and state privacy laws. Requirements include notice obligations, opt-out rights, data minimization and secure handling of personal data.

### 8. Competition & Antitrust Laws

ComSIT complies with the Sherman Act, Clayton Act, and FTC Act. Price-fixing, market allocation, bid-rigging, and exchange of sensitive competitive information are prohibited.

## 9. Conflicts of Interest

Employees must disclose personal, financial, or professional interests that could influence business activities.

## 10. Intellectual Property Protection

Unauthorized use, disclosure, copying or distribution of confidential or proprietary data is prohibited.

## 11. Anti-Money-Laundering (AML)

ComSIT performs KYC checks, monitors unusual financial transactions, and ensures transparent payment processes.

## 12. Financial Integrity

Accurate, complete, and timely financial reporting is mandatory. Shadow accounts, fictitious invoices, or misleading entries are strictly prohibited.

## 13. Whistleblowing (SOX / Dodd-Frank)

Whistleblowers are protected under SOX and Dodd-Frank. Anonymous reporting is permitted, and retaliation is strictly forbidden.

## 14. Non-Retaliation

No employee may be disadvantaged, threatened, or dismissed for reporting concerns in good faith.

## 15. Final Provisions

This Addendum supplements the global Code of Conduct and is reviewed annually.