



MUBADALA



International Trade Controls Policy

International Trade Controls Policy

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| Authorized by: | Mubadala Investment Company PJSC Ethics & Compliance Office: Name: Shahzad Khan Title: Head of Ethics & Compliance | |
| Policy Owner | Ethics & Compliance Office The Policy Owner is responsible for periodically reviewing and updating this Policy so as to reflect regulatory, best practice, and business developments. | |

Applicability & Consequences

This Policy applies to the Mubadala Group and to Mubadala Group Personnel.

Mubadala Group Personnel agree to uphold Mubadala’s commitment to do what is right and to follow this Policy and the Mubadala Group Code of Conduct. Mubadala Group Personnel who fail to uphold this commitment put themselves, their colleagues, and the Mubadala Group at risk of fines, penalties, and reputational damage and personally may be subject to disciplinary action, up to and including, loss of employment. The Mubadala Group reserves the right, at its sole discretion, to disclose information about violations of law to relevant authorities. Any Mubadala Group Personnel who have violated applicable laws may be personally liable for penalties or fines or may be subject to imprisonment.

A Mubadala Group Asset may establish standards that are stricter than this Policy. If a Mubadala Group Asset determines that this Policy is too restrictive for effective business operations, it may submit a written request for deviation, including a detailed justification for the deviation, to the Mubadala Ethics & Compliance Office.

Mubadala Group Personnel Responsibilities

Mubadala Group Personnel are required to:

- Follow applicable laws and regulations;
- Understand and comply with the requirements of this Policy, the Mubadala Group Code of Conduct, other Group Policies, and any Division/Sector or Asset policies or procedures in relation to this Policy;
- Demonstrate ethics, integrity, and accountability at all times and expect the same from others; and
- Complete assigned training.

Leadership will:

- Provide appropriate resources and support to ensure the successful implementation of this Policy; and
- Encourage questions, report of concerns and promote corrective actions when needed.

For Questions & Reporting Violations

Refer in good faith any questions, concerns, or any known or suspected violations of this Policy to your line manager or other internal management or to the Ethics & Compliance Office (see Appendix 1 for contact information).

Retaliation for good-faith reporting is not tolerated. Mubadala Group Personnel who engage in retaliatory conduct are subject to disciplinary action.

Policy Summary

Most countries control international trade transactions with laws and regulations that govern trade in goods, software, technologies, and services; financial transactions; and brokering (e.g., middleman activities). For foreign policy, humanitarian, and national security reasons, these laws and regulations dictate how certain goods, software, technology, and services must be managed when Importing, Exporting, transferring, Re-Exporting, or Re-Transferring them.

Articles and Defense Services may be subject to restrictions due solely to their military or defense application or due to use in both commercial and military (Dual-Use) applications. For instance, the United States International Traffic in Arms Regulations (ITAR) apply to Defense Articles and Services and the Export Administration Regulations (EAR) apply to commercial and Dual-Use Articles.

Restrictions on international trade are broad and complex and may apply extra-territorially (i.e., outside of the borders of the regulating country). For example, Articles subject to the EAR or ITAR may be Controlled by the US government wherever they are located and regardless of how long they have been outside the US. It is the responsibility of Mubadala Group Personnel to understand these rules and how they apply to transactions of the Mubadala Group and to put in place appropriate policies, procedures, and controls to follow the rules.

It is essential that Mubadala and each Asset establish an appropriate and adequate Trade Controls Compliance Program to manage their Articles and Defense Services. To do so, Mubadala Group Personnel must understand the Articles and Defense Services that are manufactured, handled, Imported, Exported, Re-Exported, and Re-Transferred and specific restrictions that apply.

This Policy sets forth minimum expectations for the Mubadala Group to establish appropriate policies, procedures, and processes aligned to risk, business needs, and specific jurisdictional and regulatory requirements.

This Policy is to be used in conjunction with the Mubadala Group Code of Conduct and any other relevant Mubadala Group or local policies.

Definitions

Throughout this Policy, defined terms are capitalized and have the following meanings:

- **Article:** Any item, part, good, component, software, or Technical Data/Technology, whether utilized for defense, commercial, or Dual-Use purposes. Different global regulations may provide specific definitions and requirements within their regulations.
- **Asset:** Any company or business within the Mubadala Group.
- **Controlled:** A “controlled” Article, for example, requires a License prior to Export, Re-Export, or Re-Transfer.
- **Defense Article:** Any Article or Technical Data designated on the United States Military List or on any other government’s military list. The term includes Technical Data recorded or stored in any physical form, for example, models or mock-ups. These items are specifically designed or developed for military applications and can be manufactured, sold, or Exported to both military and commercial end-users but almost always require a License prior to Export or Re-Export.
- **Defense Service:** Furnishing assistance, including training, to a Foreign Person, whether performed in the country of origin or abroad, in the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing, or use of Defense Articles.
- **Division/Sector:** A business or corporate function of Mubadala.
- **Dual-Use:** Articles that have both commercial and military or proliferation applications.
- **Ethics & Compliance Office:** The Mubadala Ethics & Compliance Office or relevant Asset ethics & compliance function.
- **Export:** Includes:
 - Sending or taking Controlled Articles out of the country of origin (i.e., the country in which it was made) or dispatch (i.e., the country from which it is sent), in any manner;
 - Disclosing (oral or visual) or transferring Technical Data/Technology to any person (natural or legal) outside the country of origin or dispatch or to a Foreign Person whether in the country of origin or dispatch or other country; or
 - Performing a Defense Service whether in the country of origin or dispatch or other country.
- **Foreign Person:** A natural person who is not a citizen or lawful permanent resident of the country of origin or dispatch or any foreign corporation, business, association, partnership, trust, society, or any other entity or group that is not incorporated or organized to do business in the country of origin or dispatch, including international organizations, foreign governments, and any agency or subdivision of foreign governments.
- **Group Policy(ies):** Any policy that applies to the Mubadala Group. Group Policies do not include policies that only apply to a limited set of Mubadala Group Personnel, for example, a policy that only applies to a specific Division/Sector or Asset within the Mubadala Group.

- **Import:** (Noun) The receipt of Articles or services from abroad. (Verb) The act of or the process of receiving Articles or services from abroad.
- **Leadership:** The Chief Executive Officer or equivalent of the Mubadala Group, a Mubadala Sector or Division head, or, in each case, a nominated representative.
- **License:** Authorization from the applicable government(s) to Export, Re-Export, Re-Transfer, or conduct any other regulated activity.
- **Mubadala Group:** Mubadala Investment Company PJSC (Mubadala); any entity, operation, or investment controlled by Mubadala; and/or any entity, operation, or investment that adopts the Mubadala Group Code of Conduct.
- **Mubadala Group Personnel:** All individuals who work directly for or represent the Mubadala Group, including directors, employees, consultants, and long-term contractors of the Mubadala Group.
- **Re-Export or Re-Transfer:** (a) Shipment or transmission of a Dual-Use Article from the country of original Export to another country; (b) Transfer of a Defense Article or Defense Service to an end-use, end-user, or destination not previously authorized; or (c) For satellites, transfer of registration of a satellite or operational control over a satellite from a party resident in one country to a party resident in another country.
- **Restricted Party(ies):** Any party (whether a legal or natural person) that is subject to trade controls, sanctions, embargoes, denied party, or other trade restrictions either individually or by virtue of being resident, domiciled, incorporated, or located in a country that is subject to such restrictions.
- **Technology Control Plan(s):** A formal, written plan to monitor and control access to Controlled Articles and Defense Services.
- **Technical Data/ Technology:** Information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, modification, use, installation, overhaul, or refurbishing of Articles. Information may be in the form of blueprints, drawings, photographs, plans, instructions, diagrams, models, formulae, tables, engineering designs and specifications, manuals, and documentation no matter the media. Technical Data typically refers to Defense Articles and Defense Services. Technology typically refers to Dual-Use Articles. Different jurisdictions may define and apply Technology and Technical Data differently.
- **Trade Controls Compliance Program:** A formal framework of policies, procedures, assessment, processes, and controls to ensure adherence to international trade requirements.
- **Trade Controls Focal(s):** Person(s) who manage(s) and has(ve) the functional responsibility for the Trade Controls Compliance Program for the Mubadala Group Asset. This need not be a stand-alone position and may be full-time or part-time, depending upon the risk, nature, and needs of the Mubadala Group Asset.

Policy Requirements

Mubadala and each Asset must be aware of the legal and regulatory requirements applicable to its international trade transactions. Mubadala and each Asset must determine whether it manufactures, procures, hosts, transacts, receives, Exports, Re-Transfers, or sells (directly or indirectly) any Controlled Article or Defense Service or Imports any Article that may be subject to authorization requirements (e.g., explosives, dangerous or hazardous goods, nuclear equipment, including healthcare imaging equipment). The Mubadala Group must understand the risks involved in international trade transactions and manage those risks appropriately.

It is the responsibility of Leadership to establish and implement an appropriate organizational structure and Trade Controls Compliance Program to comply with applicable international trade regulations.

The following elements should form part of a Trade Controls Compliance Program, where applicable:

- Program owner with adequate resources;
- Restricted party screening;
- Classification;
- License management;
- Training;
- Recordkeeping; and
- Monitoring.

1. Organizational Structure and Resources

Asset Leadership must establish clear organizational ownership and resources to ensure trade controls compliance across its operations. The Trade Controls Compliance Program should be owned by a senior leader of the Asset who will appoint a Trade Controls Focal (functional designation) and ensure that adequate resources are available to manage the Trade Controls Compliance Program based on the level of risk in and operations of the business.

The Trade Controls Focal is responsible for:

- Acting as point of contact with the Ethics & Compliance Office and Legal Counsel on trade controls matters.
- Conducting trade controls risk assessments (alone or in conjunction with other resources).
- Being knowledgeable about when and how legal and regulatory restrictions apply and providing updates on changes to applicable regulations.
- Establishing internal processes and procedures to ensure compliance with this Policy.
- Establishing, maintaining, and communicating business-specific trade controls policies and procedures.
- Managing Licenses and agreements to maintain validity and accurate reporting and

recordkeeping.

- Establishing appropriate Technology Control Plan(s).
- Providing training to relevant Mubadala Group Personnel.
- Establishing processes to manage recordkeeping, including electronic storage.
- Ensuring adherence to regulations, including:
 - Performing necessary Restricted Party screening.
 - Responding to warning signs of possible violations of policy or law.
 - Reporting immediately to Legal Counsel and the Ethics & Compliance Office any actual or suspected non-compliance.
 - Classifying accurately Articles and services.
 - Maintaining proper documentation, License management, and reporting.
 - Complying with agreements and Licenses.
 - Instructing and monitoring freight forwarders, carriers, and customs brokers and ensuring that proper declarations are made and necessary authorizations are in place.

2. Restricted Party Screening

a. Transaction Screening

To ensure that transactions are performed legally and do not violate any applicable trade controls, sanctions, embargoes, or denied party restrictions, the Asset should perform risk-based Restricted Party screening. Parties subject to screening may include buyer, seller, consignees, agents, vessels, financial institutions, and end-users. Screening should occur, at a minimum, prior to Export, Re-Transfer, or Re-Export, or to providing a Defense Service. If a Restricted Party participates in a transaction, a determination, made in conjunction with the Ethics & Compliance Office and Legal Counsel, must be made whether it is appropriate to proceed with the transaction. Please refer to the Business Partner Due Diligence Policy for more detail on the screening process.

Screening procedures also might include managing and reporting any evidence of diversion or unauthorized use of Controlled Articles or Defense Services.

b. Mubadala Group Personnel Screening

There may be restrictions on providing Controlled Articles and Defense Services to persons of certain nationalities. Therefore, the Trade Controls Compliance Program should track and monitor the nationality(s) of Mubadala Group Personnel at facilities with Controlled Articles or Defense Services. Nationality may include all countries of citizenship, permanent residence, and birth. The Human Capital function, the recruiting manager, and the Trade Controls Focal should ensure that candidates for employment or transfer to a role that requires access to Controlled Articles or Defense Services are eligible in accordance with relevant international trade regulations. In addition, prior to hire, candidates should be screened through an appropriate restricted party screening process. Any data privacy concerns should be directed to the Ethics & Compliance Office.

Mubadala Group Personnel who, due to regulatory requirements, may not gain access to Controlled Articles and Defense Services must be prevented, physically and/or electronically, from accessing those Controlled Articles and Defense Services. Where necessary, the Mubadala Group (and each Asset) must implement a Technology Control Plan to control and prevent unauthorized access to Controlled Technical Data/Technology and Defense Services.

c. Embargoes, Sanctions, and Anti-Boycott Screening

Many countries impose restrictions, embargoes, or sanctions on business and financial transactions with certain other countries or locations. The list of geographical locations and the level of restrictions in place are frequently modified. The Trade Controls Focal will ensure that Mubadala Group Personnel understand and consider applicable geographical restrictions.

To identify attempts to evade geographical restrictions, it is important to understand the business and transaction and be aware of unusual requests. See Appendix 2 for examples of common trade control red flags you may encounter relating to unusual activities, enquiries, or transactions that may present risk.

No Article should be Exported, Re-Exported, or Re-Transferred without an assessment of geographical risk and determination that no sanctions, embargoes, or other restrictions apply. Geographical restrictions should be reviewed and applicability and impact determined, at a minimum, during contract assessment.

An undertaking in a location subject to sanctions must receive Mubadala prior approval via the Country Entry process. The current Country Entry form is available on the Ethics & Compliance Office homepage.

In addition, US laws and regulations prohibit participation in certain boycotts that are not approved by the US. These laws may prevent US persons and (possibly) foreign affiliates of US companies from refusing to do business with a certain country or national. If a Division/Sector or Asset receives a request for information about dealings with a specific country or nationals of a specific country or a request or requirement not to transact business with a specific country, it must contact the Ethics & Compliance Office and Legal Counsel for instructions before proceeding with the transaction.

3. Classification and Tracking of Controlled Articles

The Trade Controls Focal, together with relevant technical support, will:

- Determine the classification of Articles and services and identify License requirements.
- Determine the origin of Articles or Defense Services, whether created by the Mubadala Group or obtained from a third party, e.g., a supplier or customer.
- Know which country's or countries' trade controls laws apply to each Article or Defense Service it trades, especially whether an Article or Defense Service is subject to US export control regulations (whether the Department of Commerce, Directorate of Defense Trade Controls, or other agency).
- Establish a methodology tailored to the Asset, organization, and function to identify and track any Controlled Articles or Defense Services.
- Obtain confirmation from suppliers and manufacturers of classifications and License requirements.

- Ensure appropriate Licenses are in place prior to Import or Export and that Mubadala Group Personnel understand all provisions or limitations.
- Record the classification of Articles and Defense Services, including the controls regime, in a location accessible to appropriate Mubadala Group Personnel.
- Track Controlled Articles or Defense Services throughout their life-cycle, i.e., from the time the company manufactures or receives the Article to the time it is delivered to the end-user, transferred, disposed, or provided as a service. Ensure the process includes support functions that may handle Controlled Articles or provide Defense Services, for example, marketing, contracts, information technology, and program management.
- Ensure all Controlled Articles are secured and maintained in a manner consistent with the relevant regulatory requirements, including physical or electronic security when required.
- Obtain an end-user/end-use statement to determine the final user, destination, and use of a Controlled Article or Defense Service.
- Maintain proof of delivery or Re-Transfer to the end-user of all Controlled Articles.
- When required, include an appropriate diversion statement on relevant sale, supply, and shipping documents. A sample diversion statement is provided in Appendix 3.
- Implement travel procedures covering Articles, including Technical Data/Technology that is stored on laptops or accessed remotely, to manage risk of unauthorized access.

It is a best practice to require, as a matter of contract, that a supplier provide trade controls information that may be required to comply with Import and Export requirements, including:

- Part number, drawing number, and description.
- Original or modified use (to determine whether civil/commercial, or defense/military, or Dual-Use application).
- Country of origin.
- Amount of US Controlled content.
- To what country's or countries' trade controls laws Articles are subject.
- Classification.
- License provisos and conditions.

4. License Management

As determined by the classification of an Article or Defense Service, its end-use, or its end-user, certain Imports or Exports may require prior government permission in the form of a License, use of an applicable exception or exemption, or other written authorization. Articles or Defense Services that require a License to Import or Export are Controlled.

The Trade Controls Focal will determine whether a License, exception, exemption, or other written authorization applies to Articles or Defense Services. Licenses may be required, for example, to:

- Import hazardous or dangerous goods.
- Provide or Transfer Controlled Articles or Technical Data/Technology to customers or suppliers or Foreign Persons (wherever located).
- Return a Controlled Article to a foreign supplier for repair.
- Return a Controlled Article after it has been received, repaired, or replaced.
- Discuss Technical Data with a Foreign Person or supplier.
- Perform Defense Services.
- Broker a deal for a Controlled Article or Defense Service.
- Re-Export or Re-Transfer Controlled Articles.
- Use or transfer Controlled Articles or provide a Defense Service for an end-use or end-user not included in the original License.
- Transact with a Restricted Party or restricted geography.

The Trade Controls Compliance Program should include procedures to ensure:

- Identification of License requirements.
- Licensed Articles or Defense Services are accessed and received only by those parties authorized under the License.
- License ownership resides with the person in control of the work or project activity, for example the program manager.
- License conditions are satisfied and not breached.
- Licenses are appropriately decremented (i.e., the number of authorized shipments is decreased by the correct amount with each shipment).
- Licenses are renewed on time.
- Licenses are amended when and if necessary.

5. Training

Leadership must ensure that adequate resources are available to support trade controls training efforts. The Trade Controls Focal is responsible for ensuring that appropriate training is provided. The content and frequency of training should be aligned to the risk profile of the Asset and its relevant operations. Training needs should also take into account audit findings. A sample training schedule is provided at Appendix 4.

6. Recordkeeping

International trade regulations and laws often stipulate specific recordkeeping and reporting requirements. Most countries establish criteria for documenting transactions, e.g., stating specific License language on shipping documents; recording and reporting License utilization; and regulatory retention periods for records.

The Trade Controls Focal should adopt procedures to manage recordkeeping requirements, taking into account the specific requirements of License provisions and regulatory requirements applicable to the business and transactions. Consideration should be given to:

- Describe records, with accurate recording in accordance with applicable rules.
- Maintain records for the retention period required by a License and applicable regulations; for example, US regulations require records to be retained for five years from the expiration of the License or other approval.
- Perform regular internal reviews of files.
- Maintain compliance training records.
- Retain all License approvals and related agreements.
- Maintain personal details of all individuals (e.g., nationality(s) and passport information) who have access to controlled Articles or Defense Services, together with any applicable Non-Disclosure Agreements.

7. Internal Monitoring

The Trade Controls Focal will perform a self-assessment at least annually to test the effectiveness of the Trade Controls Compliance Program. The self-assessment will include corrective actions and may include, but is not limited to:

- Specific procedure review and random document review and tracing of processes.
- Validation of adherence to License and other approval conditions.
- Validation of classification processes, including supplier origin declarations.
- Validation of shipping documents and Import and Export declarations.
- Review of recordkeeping, communications, document transfer, and retention periods.
- Examination of organizational structure, reporting relationships, resources, and assigned responsibilities.

Any suspected or actual violations detected during a self-assessment must be raised to the Ethics & Compliance Office and Legal Counsel. Findings from the reviews and audits should feed into training and development needs where appropriate.

8. Communications with local and foreign government agencies and regulators

Mubadala Group Personnel should obtain approval from the Ethics & Compliance Office and Legal Counsel prior to exchanging any non-routine communication with a foreign government regulatory agency regarding international trade matters, such as potential or actual violations, disclosures, audit, information request, or investigation. Application for and execution of License agreements must be in accordance with relevant Delegation of Authority and Legal Counsel approval. Routine and normal day-to-day business-related trade controls communications should be managed by the Trade Controls Focal.

9. Violations

If any Mubadala Group Personnel has reason to believe that an Import, Export, Re-Export, or Re-Transfer has or may be destined for an inappropriate end-use, end-user, or destination or that there is or may be a violation of a trade controls regulation, the person must immediately cease the transaction and contact the Trade Controls Focal, Ethics & Compliance Office, and Legal Counsel.

It is critical that potential violations are reported promptly. Whether a disclosure will or must be made to appropriate government regulators or business partners is the decision of the Ethics & Compliance Office and appropriate Legal Counsel, and these communications will be managed and coordinated by Legal Counsel.

Appendix 1

Ethics & Compliance Contact Information

Global number (Mubadala head office, Abu Dhabi): +971 2 413 3333

Toll-free numbers are available for the following countries:

United Arab Emirates 800 413 3333
Outside UAE (listed below): 800 2 444 3333*

| | | | |
|-----------|-----------|--------------|-------------|
| Australia | France | Malaysia | South Korea |
| Austria | Germany | New Zealand | Switzerland |
| Argentina | Hong Kong | Norway | Taiwan |
| Belgium | Italy | Philippines | Thailand |
| Canada | Japan | Singapore | UK |
| China | Macau | South Africa | USA |

*This toll-free number is only available from the countries listed above. Before dialing the number, you will need to dial your country's international dialing code (e.g., 011 for USA, 00 for UK, etc.) OR dial "+" on your mobile phone.

Facsimile: +971 2 413 5059
E-mail: ethics@mubadala.ae
Website: www.mubadalacompliance.ae
Post: Mubadala Investment Company PJSC
Ethics & Compliance Office
PO Box 45005
Abu Dhabi, UAE

Appendix 2

Red Flags

Remain vigilant and aware of unusual, activities, inquiries, or transactions. Proceeding even though there is a red flag is not prohibited, but measures should be taken to mitigate risk to the extent possible. The following is a non-exhaustive list of red flag examples:

- Unfamiliar customer without convincing references.
- Unusual transaction for this consignee, customer, end-use, or location.
- Evasive, reluctant, or otherwise unsatisfactory answers by a customer to questions about end-use, end-user, delivery dates, or delivery locations.
- Unusually favorable payment terms.
- Unusual security or safety measures.
- Links to the military that seem inappropriate to the stated business or transaction.
- Involvement of parties engaged in terrorist activities, development of biological, chemical, and nuclear weapons, or ballistic missiles.
- Transactions involving an embargoed country, a citizen or representative of an embargoed country, or an individual or entity subject to government sanction.
- The customer or its address is similar to one of the parties found on a list of restricted parties.
- The product's capabilities do not fit the buyer's line of business, such as an order for sophisticated computers for a small bakery.
- The item ordered is incompatible with the technical level of the country to which it is being shipped, such as semiconductor manufacturing equipment being shipped to a country that has no electronics industry.
- The customer is willing to pay cash for a very expensive item when the terms of sale would normally call for financing.
- The customer has little or no business background.
- The customer is unfamiliar with the product's performance characteristics but still wants the product.
- Routine installation, training, or maintenance services are declined by the customer.
- Delivery dates are vague, or deliveries are planned for out of the way destinations.
- A freight forwarding firm is listed as the product's final destination.
- The shipping route is abnormal for the product and destination.
- Packaging is inconsistent with the stated method of shipment or destination.
- When questioned, the buyer is evasive and especially unclear about whether the purchased product is for domestic use, for export, or for re-export.
- The delivery location is a PO Box.

Appendix 3

Diversion Statement (Sample)

The text below is a sample destination control (i.e., diversion) statement.

There may be other text that is appropriate or that is required by law:

These commodities, technology, or software were exported in accordance with applicable law and may be subject to export and/or import authorization(s). Diversion contrary to law is prohibited.

Appendix 4

Sample Training Schedule

The key functions responsible for elements of international trade transactions include, but are not limited to, the personnel in the chart below, who should be trained, for instance, in accordance with risk, their responsibilities, and access to Controlled Articles and whether they provide Defense Services. The table below is a sample training schedule.

| Function | Frequency | Type of Training |
|---|---|-------------------|
| Senior Executives | Trade Controls Compliance Program roll out Minimum every 2 years | High Level |
| All new employees | Within 2 weeks of hire Then based on functional requirements | Basic Orientation |
| Engineering/Configuration Management/Service Engineers | Before accessing tools or handling Controlled Articles or providing a Defense Service Ongoing at least every 2 years | Focused Training |
| Procurement or responsible parties for procurement activities | Before accessing tools or handling Controlled Articles or providing a Defense Service Ongoing at least every 2 years | Focused Training |
| Logistics/Shipping/Dispatch | Before accessing tools or handling Controlled Articles Ongoing at least every 2 years | Focused Training |
| Program Management | Before accessing tools or handling Controlled Articles Ongoing at least every 2 years | Focused Training |
| Human Resources | Before accessing tools or handling Controlled Articles Ongoing at least every 2 years | Focused Training |
| Marketing | Before accessing tools or handling/creating/sharing Controlled Articles Ongoing at least every 2 years | Focused Training |
| Legal & Contracts | Before accessing tools or handling/creating/sharing Controlled Articles Ongoing at least every 2 years | Focused Training |

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| Security | Before accessing tools or handling/creating/sharing Controlled Articles Ongoing at least every 2 years | Focused Training |
| IT | Before accessing tools or handling/creating/sharing Controlled Articles Ongoing at least every 2 years | Focused Training |
| Technical Trainers | Before accessing tools or handling Controlled Articles or providing a Defense Service Ongoing at least every 2 years | Focused Training |