



Export Compliance Statement

EXPORT CONTROLS

TRAX fully complies with all U.S. Export Control Regulations, including the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR) to ensure that our technology products are eligible for export in compliance of these regulations. TRAX certifies that its products:

- do not meet the criteria to be considered [De minimis U.S. content](#).
- are not the type of items listed in the [Commerce Control List](#).
- are not part of or subject to any military commodities as described on the [U.S. Munitions List](#), and
- do not contain technical data as described in [22 CFR part 121.10](#).

Therefore, our products are not subject to any export restrictions relating to ITAR.

TRAX also adheres to the export restrictions imposed by OFAC and EAR in the [Export Controlled or Embargoed Countries, Entities and Persons list](#) and therefore TRAX is subject to some export and business restrictions.

TRAX will not export restricted items without documented proof of a license or agreement from the appropriate governmental authority, and will follow all terms, conditions and provisos on such license or agreement as a condition of exporting and engaging in business with its customers.

TRAXCloud ITAR CONTROLS

For Customers who have subscribed to TRAXCloud for delivery of our products, TRAX along with its exclusive hosting partner, Amazon Web Services Inc. ("AWS"), have put in place the controls required for ITAR Compliance.

AWS offers their [GovCloud](#) for consistent compliance framework across their IT environment including FedRAMP, DoD IL 5, Criminal Justice Information Services (CJIS), and International Traffic and Arms Regulations (ITAR). AWS works with its customers to pursue the required FedRAMP assessment and accreditation for each environment that we deploy on GovCloud.

TRAX requires its customers to use reasonable efforts to cooperate with and assist TRAX with correctly identifying and classifying items provided by the customer which may be subject to U.S. export control regulations. If the customer cannot, or will not, make commonly reasonable efforts to assist TRAX in this effort, then the customer hereby indemnifies and holds harmless TRAX from any resulting violation or

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penalties which may arise from the inaccurate classification of items and resulting exports of such items that occurs.

TRAX has implemented internal ITAR controls in order to provide hosted environments or data migration environments for agencies within the U.S. Department of Defense, U.S. State Department and U.S. Department of Transportation. These ITAR controls include:

- Background Screening for all Employees.
- Drug Screening for all Employees as part of a Drug-Free Workplace Program.
- Complete logical segregation of ITAR data for each client. Plus:
- Recruitment policy that requires a majority of new hires must meet the “U.S. Persons” criteria to maintain adequate number of staff available.
- Identification of employees that meet the “U.S. Persons” criteria, when hired after passing the required screenings, to be assigned the proper network and security controls.
 - User group for users that meet the “U.S. Persons” criteria.
 - Color coded badges for users that meet the “U.S. Persons” criteria
 - Log in policy to only allow users that meet criteria.
 - Network configuration to assign users that meet criteria to the ITAR virtual LAN (VLAN).
 - Only “U.S. Persons” (*US Citizens or Residents with 3 years of residency*) can access data or participate in the Project of an ITAR client.

Employees that have received clearance in compliance with ITAR Regulations, are also qualified to provide on-premise services to Customers that are self-hosting on-premise or hosting with another 3rd party provider.