A Non-Profit, Mutual-Benefit Corporation

Requirements of Membership Policy

Adopted by the ONVIF Board of Directors on

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ONVIF

Requirements of Membership Policy

ONVIF, Inc. ("ONVIF)) is committed to adhering to the laws and regulations of the state and country where ONVIF is incorporated and does business, including with respect to economic sanctions and export control restrictions. This Requirements of Membership Policy (the "Policy") documents additional "Conditions of Membership" above and beyond those stated in the ONVIF Rules of Membership, that are required by the rules and regulations of ONVIF's state and country of incorporation and any other applicable laws and regulations with respect to international trade obligations.

Statement of Policy

ONVIF will not allow membership from companies that are incorporated in locations subject to comprehensive economic sanctions ("Embargoed Locations"). Other locations may be subject to significant, although not comprehensive, economic sanctions restrictions ("Significant Sanction Locations"). Companies incorporated in Significant Sanction Locations may be subject to enhanced review and additional conditions in order to ensure that ONVIF complies with applicable economic sanctions and export control restrictions. Finally, ONVIF screens prospective and current Members against Restricted Party Lists (as defined below) often with the assistance of a third-party screening service and may consult with ONVIF legal counsel before allowing membership from companies that are identified on any Restricted Party List. ONVIF reserves the right to screen the applicant's or Member's information against any other lists to comply with applicable laws, or where sanctions risks arise.

The fact that an applying company has affiliated companies that are incorporated in Embargoed Locations or Significant Sanction Locations, or are identified on Restricted Party Lists does not imply that such company's application for membership should be declined. However, if ONVIF becomes aware of such affiliate relationships or any ownership or control-related risk, ONVIF may consult with ONVIF legal counsel and require the applicant to undertake additional obligations, provide additional information, and accept additional restrictions as a condition of membership.

"Embargoed Locations" are defined as locations subject to comprehensive trade embargoes or comprehensive sanctions imposed, administered or enforced from time to time by (i) the United States, (ii) the United Nations Security Council, (iii) the European Union, (iv) the United Kingdom, and (v) any other country in which ONVIF may operate. Because sanctions regimes change, ONVIF will maintain an internal list of Embargoed Locations and update it periodically.

"Significant Sanction Locations" are defined as locations subject to significant, but not comprehensive economic sanctions, including (for example) sectoral sanctions, investment restrictions, export control restrictions, financial services restrictions, asset freeze measures applicable to certain persons or other substantial restrictions imposed, administered or enforced from time to time by (i) the United States, (ii) the United Nations Security Council, (iii) the European Union, (iv) the United Kingdom, and (v) any other country in which ONVIF may operate. ONVIF will not maintain this definition as a fixed list of countries in the text of this Policy , but will maintain an internal, periodically updated list of Significant Sanction Locations*"* are defined as locations subject to significant, but not comprehensive economic based on current sanctions regimes and ONVIF's risk assessment.

"Restricted Party List" includes sanctions-related lists of designated, blocked, or restricted persons maintained by: (i) the U.S. Department of the Treasury Office of Foreign Assets Control (OFAC), (ii) the United Kingdom (UK Sanctions List and/or applicable UK sanctions data), (iii) the European Union (EU consolidated financial sanctions list), and (iv) the United Nations Security Council (UN Security Council Consolidated List), and any other restricted party lists ONVIF deems relevant to its compliance obligations.

A "Restricted Party" also includes any entity that is owned, in whole or in part, directly or indirectly by one or more sanctioned/blocked persons or is otherwise treated as restricted under applicable sanctions ownership/control principles.

"Ownership Information" means information reasonably requested by ONVIF to assess sanctions risk, which may include identities of all direct and indirect owners (including beneficial owners), percentage ownership interests, control indicators (e.g., voting rights, board appointment rights), and relevant supporting documentation sufficient to validate the information.

ONVIF will request Ownership Information as needed for sanctions-risk assessment and will handle such information in accordance with ONVIF's confidentiality and data protection practices.

<u>Procedure</u>

Process for Accepting New Members:

Applicants from Embargoed Locations will be immediately rejected. For all other applicants, the ONVIF Board of Directors ("Board") will review applications for membership during the regular Board meetings. The Board will screen applicants against Restricted Party Lists by using the Consolidated Screening List, found at https://www.trade.gov/data-visualization/csl-search, and any other restricted party screening tool the Board deems appropriate, including screening for OFAC, UK, EU, and UN designations. As part of ONVIF's membership screening process ONVIF may use the services of third parties to conduct sanctions screening and may provide information about Applicant, including information obtained from Applicant, to such third party screening service. The screening ensures that applicants are not prohibited from membership with ONVIF due to applicable sanctions, which in some cases requires obtaining information, which may include personal information, about applicant's direct or indirect owners, representatives, shareholders or beneficial owners. Applicant is required to provide all necessarily information for ONVIF to comply with applicable laws, and by applying for membership in ONVIF consents to the use of their information in connection with the screening process. The ONVIF Privacy Policy provides additional information about how ONVIF obtains and uses personal data. A copy of the Privacy Policy may be obtained at the following https://www.onvif.org/privacy-policy/, such location may be changed by ONVIF from time to time, but will be accessible through ONVIF's main homepage. If applicant does not provide requested information about applicant's ownership or other information needed to complete the applicant screening process described herein within thirty (30) days from initial request by ONVIF then ONVIF reserves the right to cancel applicant's application or membership and return any fees.

In the event that an applicant is identified on a Restricted Party List or otherwise incorporated in a Significant Sanctions Location, the Board may ask the Executive Director ("ED") to send the applicant an ownership screening questionnaire, and then after it is returned, consult with ONVIF Legal Counsel for a recommendation on whether to accept the application for membership. In other instances, the ED may consult directly with the Legal Counsel without obtaining an ownership screening questionnaire from the applicant. In any case, the ED will relay the Legal Counsel's response to the Board and the Board will decide accordingly.

Process for Reviewing Status of Existing Members:

If and when a new location becomes an Embargoed Location or a Significant Sanction Location (as reflected in ONVIF's internal lists), the ED shall review the list of members and the locations where each is Incorporated or principally operates.

If a member is from an Embargoed Location, then the Board should be notified and that member's membership should be immediately terminated. If a member is located in a Significant Sanction Location or becomes identified on a Restricted Party List, the ED shall notify the Board, which will determine whether additional action is required, consulting with ONVIF Legal Counsel as necessary.

Ownership Follow-Up for Private Company Members. ONVIF may request Ownership Information from private company members from time to time as required to comply with applicable laws, including, but not limited to, at onboarding, renewal, or when triggered by sanctions-risk indicators (e.g., sanctions list updates, changes in ownership/control, credible adverse information, or elevated membership privileges), to determine whether any owner or controller poses sanctions risk. Such requests will be risk-based and documented. As part of ONVIF's membership screening process ONVIF may use the services of third parties to conduct sanctions screening and may provide information about Member, including information obtained from Member, to such third party screening service. The screening ensures that Members are not prohibited from continuing their membership with ONVIF due to applicable sanctions, which in some cases requires obtaining information, which may include personal information, about Member's direct or indirect owners, representatives, shareholders or beneficial owners. Member is required to provide all necessarily information for ONVIF to comply with applicable laws, and by participating in ONVIF consents to the use of their information in connection with the screening process. The ONVIF Privacy Policy provides additional information about how ONVIF obtains and uses personal data. A copy of the Privacy Policy may be obtained at the following https://www.onvif.org/privacy-policy/, such location may be changed by ONVIF from time to time, but will be accessible through ONVIF's main homepage. If Member does not provide requested information about Member's ownership or other information needed to complete the Member screening process described herein within thirty (30) days from initial request by ONVIF then ONVIF reserves the right to suspend or terminate Member's membership.

Compliance with International Trade Laws

ONVIF members shall not cause ONVIF to violate international trade laws, including export controls and economic sanctions restrictions. Among other appropriate steps, members shall not rely on employees physically located, or ordinarily resident, in Embargoed Locations to participate in ONVIF activities.

ONVIF reserves the right to modify or amend this policy at any time.