



KONGSBERG

Protecting people and planet

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Technology leadership from deep sea to outer space



Deep sea



Seaborne



Land-based



Airborne



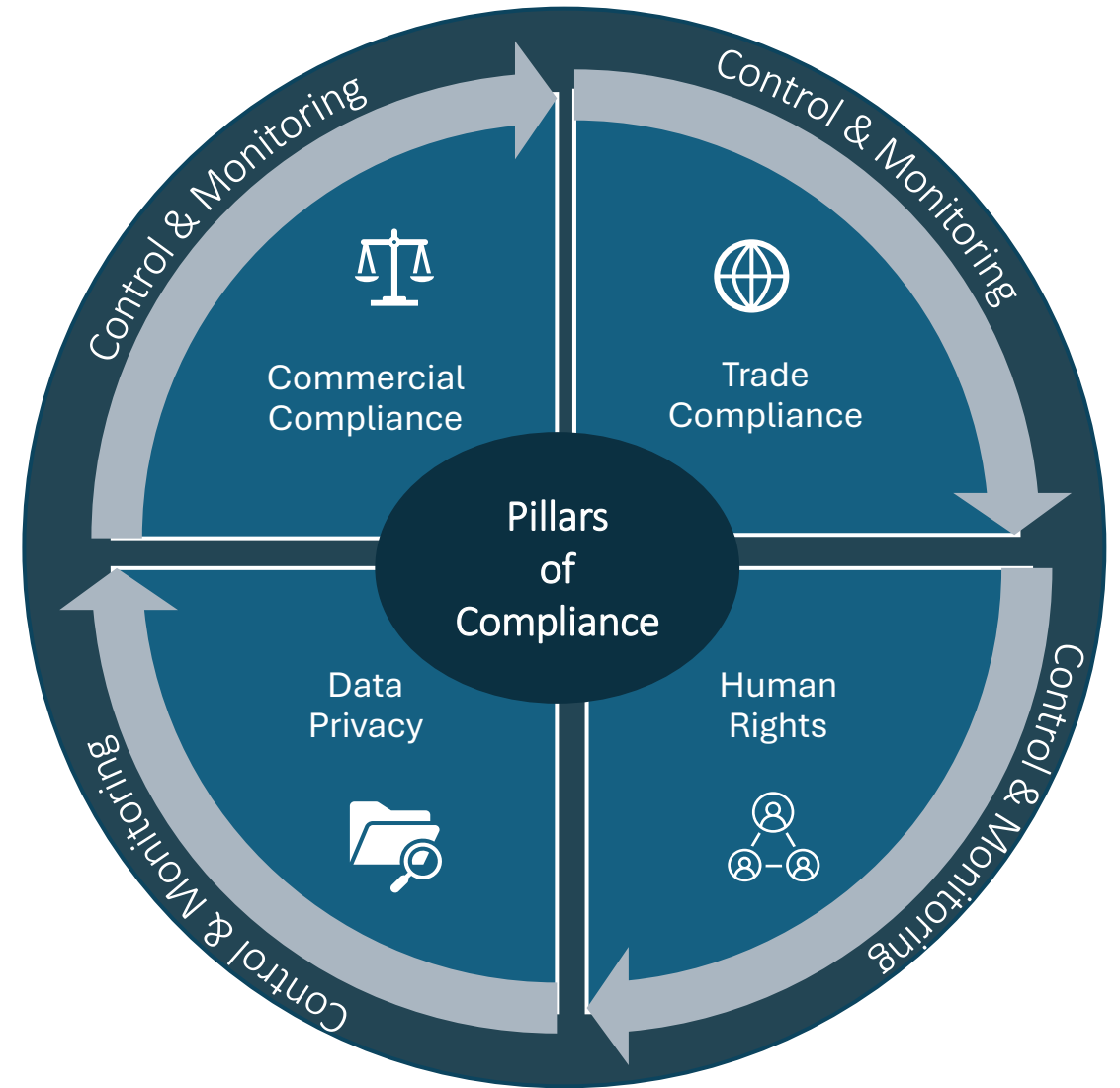
Digital frontier



Outer space

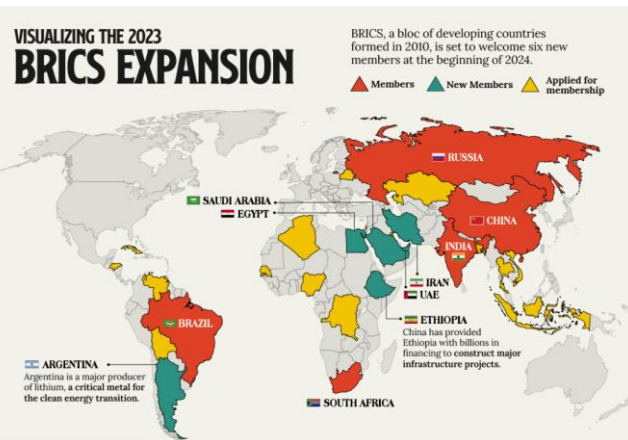
Pillars of Compliance

- Compliance in KONGSBERG comprises of 4 aspects
- Whilst the subject matters are different, they also overlap
- Indicators of risk in one area can often be linked to or impact risk in other areas
- Key is know you business partners and your own house, perform sufficient due diligence and take a risk based approach





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Framework



**Export
Administration
Regulations**

2013



U.S. Department of Commerce
Bureau of Industry and Security



United States Publishes a Global Maritime Advisory to Counter Sanctions Evasion by Iran, North Korea, and Syria



Department of the Treasury



Department of State



United States Coast Guard

Sanctions Advisory for the Maritime Industry, Energy and Metals Sectors, and Related Communities

Issued: May 14, 2020

Title: Guidance to Address Illicit Shipping and Sanctions Evasion Practices

Maritime Guidance

Financial sanctions guidance for entities and individuals operating within the maritime shipping sector



December 2020



Forsiden • Aktuelt • Nyheter

Navnet på ny etat:

Direktoratet for eksportkontroll og sanksjoner

Nyhet | Dato: 09.02.2024

Det er besluttet i statsråd 9. februar at etaten for eksportkontroll og sanksjoner som skal opprettes innen 1. januar 2025 får navnet «Direktoratet for eksportkontroll og sanksjoner» (DEKSA). Utenriksdepartementet har utnevnt Harriet E. Berg til direktør av det nye direktoratet for en periode på to år.



DEKSA

Direktoratet for
eksportkontroll
og sanksjoner



**INSPEKTIONEN FÖR
STRATEGISKA PRODUKTER**



	China	Hong Kong	Singapore	Taiwan
Key Regulators	Ministry of Commerce Chinese Customs Bureau	Trade and Industry Department Customs and Excise Department	Ministry of Trade and Industry Singapore Customs	Bureau of Foreign Trade
Licensable Export Activities (Dual-Use & Military)	Import, Export, Transit, Tranship (Dealing with military items is restricted to authorised entities)	Import, Export, Transit, Tranship	Export, Tranship, Transit, Intangible transfer, Brokering	Export, Tranship, Transit
License Types	Individual General	Individual AIP for Bulk Users US's HK rule Munitions List Dual-Use Goods List (EU numbering system)	Individual/Bulk Brokering permit ITT permit Military Goods and Dual-Use Goods List (EU numbering system)	Individual Bulk EU lists
Classification List	Own system with multiple lists, only in Chinese			



Veileder for eksport av teknologi

August 2025



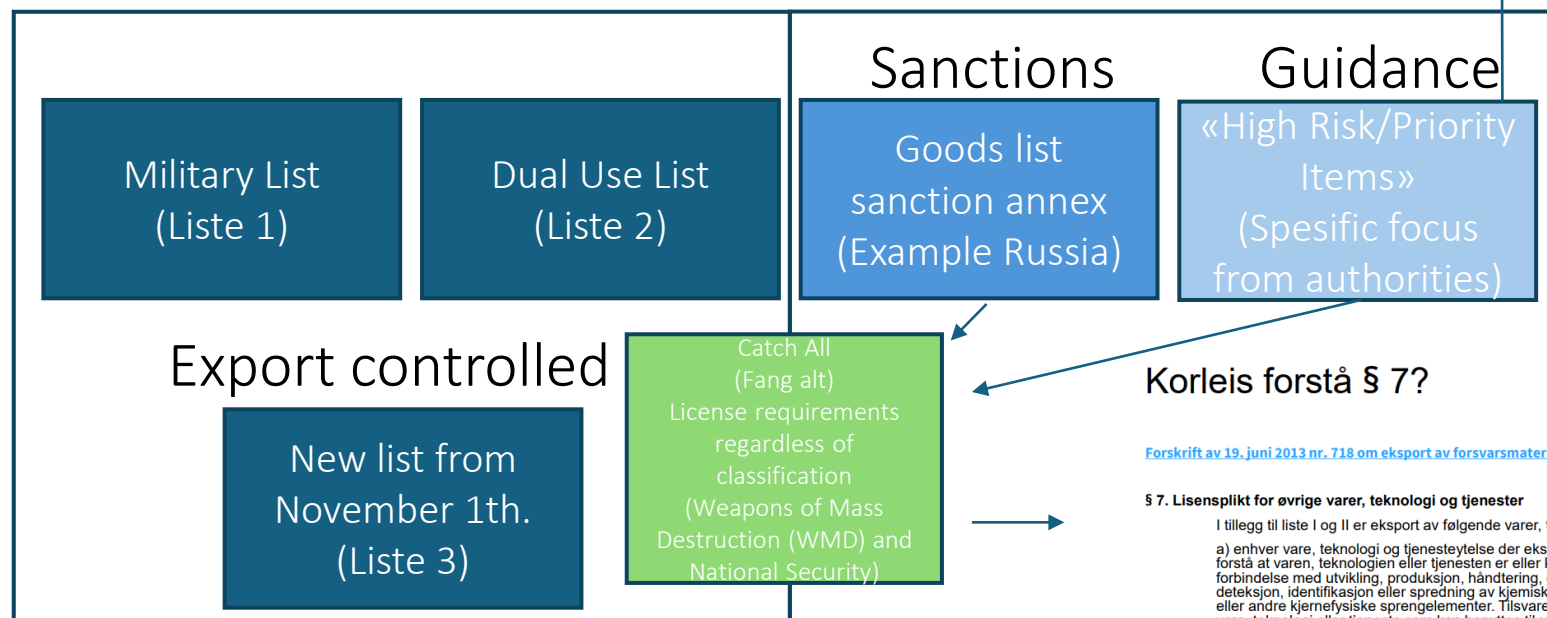
Veilederen er utarbeidet og publisert av Utenriksdepartementet, og erstatter retningslinjene for kontroll med kunnskapsoverføring som ble publisert 11. mai 2016.

Veilederen er relevant for kunnskapsaktører, samt næringsliv og industri. Den er ment å bidra til bedre forståelse for regulering knyttet til eksport av teknologi, og skal sette relevante aktører bedre i stand til å etterleve eksportkontrollregelverket. Veilederen har tolkninger av flere bestemmelser for kontroll med eksport av teknologi, og angir hvordan man kan vurdere om teknologi er omfattet av reglene for lisensplikt.

Development «Controlled Goods»

Export control/sanctions

Includes more and more...



A1: Based upon historical information and current developments, BIS has identified the following commodities as presenting a special concern because of their potential diversion to and end use by Russia and Belarus to further their military and defense capabilities-

Aircraft Parts and Equipment – ECCN 9A991 Antennas – ECCN 7A994 Breathing Systems – ECCN 8A992 Cameras – ECCN 6A993 GPS Systems – ECCN 7A994 Inertial Measurement Units – ECCN 7A994 Integrated Circuits – ECCN 3A001, 3A991, 5A991 Oil Field Equipment – ECCN EAR99 Sonar Systems – ECCN 6A991 Spectrophotometers – ECCN 3A999 Test Equipment – ECCN 3B992 Thrusters (Marine) – ECCN 8A992 Underwater Communications – ECCN 5A991 Vacuum Pumps – ECCN 2B999 Wafer Fabrication Equipment – ECCN 3B001, 3B991 Wafer Substrates – ECCN 3C001 through 3C006

These commodities are of special concern because they support the development of maritime technology, microelectronics, and other technologies that can be used to support Russia's military and defense sector.

These items were identified based on historical and current trends in Russia's procurement efforts on behalf of their defense industrial base. Most of these items were previously easily obtainable by Russia-based entities prior to the imposition of more stringent export controls in response to the invasion of Ukraine. After the imposition of those controls, all of the items listed above require a BIS license prior to export or reexport to Russia or Belarus. The above list is not exhaustive of all commodities requiring a license for export to Russia and/or Belarus. For a full list of items that now require a license if destined to Russia or Belarus, see 15 CFR Part 746, Supp. Nos. 2, 4, and 5, and Part 774, Supp. No. 1.

Korleis forstå § 7?

[Forskrift av 19. juni 2013 nr. 718 om eksport av forsvarsmateriell, flerbruksvarer, teknologi og tjenester.](#)

§ 7. Lisensplikt for øvrige varer, teknologi og tjenester

I tillegg til liste I og II er eksport av følgende varer, teknologi og tjenester lisenspliktige:

- enhver vare, teknologi og tjenesteytelse der eksportøren er kjent med eller har grunn til å forstå at varen, teknologien eller tjenesten er eller kan være ment, helt eller delvis, for bruk i forbindelse med utvikling, produksjon, håndtering, drift, vedlikehold, lagring, deteksjon, identifikasjon eller spredning av kjemiske, biologiske eller kjernefysiske våpen eller andre kjernefysiske sprengemidler. Tilsvarende regler gjelder for eksport av enhver vare, teknologi eller tjeneste som kan benyttes til utvikling, produksjon, vedlikehold eller lagring av missiler som kan levere slike våpen,
- enhver vare, teknologi eller tjeneste til militær bruk til områder som er underlagt våpenembargo vedtatt av FNs sikkerhetsråd med hjemmel i FN-paktens kapittel VII eller andre tiltaksregimer Norge har sluttet seg til,
- enhver vare, teknologi og tjeneste til militær bruk til områder hvor det er krig, krig truer eller til land hvor det er borgerkrig.
- enhver vare, teknologi og tjeneste som direkte kan tjene til å utvikle en stats militære evne på en måte som ikke er forenlig med vesentlige norske sikkerhets- og forsvarsinteresser.

Risk

Red flag guidance



Department of Commerce, Department of the Treasury, and Department of Justice Tri-Seal Compliance Note: *Cracking Down on Third-Party Intermediaries Used to Evade Russia-Related Sanctions and Export Controls*

Regulator expectations – US

1. US Department of Commerce, Department of the Treasury, and Department of Justice Tri-Seal Compliance Note, of 2 March 2023 – Cracking Down on Third-Party Intermediaries Used to Evade Russia-Related Sanctions and Export Controls
2. Example of evasion/diversion tactics based on recent DOJ indictments:
 - Claiming that shell companies located in third countries where intermediaries or end user;
 - Claiming that certain items would be used by entities engaged in activities subject to less stringent oversight;
 - Dividing shipments of controlled items into multiple, smaller shipments to try to avoid law enforcement detection;
 - Using aliases for the identities of the intermediaries and end users;
 - Transferring funds from shell companies in foreign jurisdictions into US bank accounts and quickly forwarding or distributing funds to obfuscate the audit trail or the foreign source of money;
 - Making false or misleading statements on shipping forms, including underestimating the purchase price of merchandise by more than five times the actual amount
 - Claiming to do business not on behalf of a restricted end user but rather on behalf of a US-based shell company



Sanctions: Commission publishes guidance to help European operators assess sanctions circumvention risks

The Commission published today a guidance note addressed to European operators to help them identify, assess, and understand the possible risks of sanctions circumvention – and how to avoid it.

This guidance note aims at providing a general overview of what EU operators need to do when conducting due diligence in their work, as required by EU law.



Practical guidance for companies to detect and prevent circumvention of sanctions

Companies play a key role in the enforcement of sanctions and in preventing circumvention of sanctions. The Ministry for Foreign Affairs has published practical expert guidance to companies on how to detect and prevent circumvention of sanctions on the MFA Russia sanctions webpage. The guidance provides practical advice on carrying out risk assessments and sanctions compliance. The guidance includes a list of red flags that the company can use when assessing concrete cases of foreign trade. The guidance includes links to the lists published by the Commission of products of particular relevance for the enforcement of sanctions.

Indikatorer på ulovlige anskaffelser

Dagens sikkerhetspolitiske situasjon er mer alvorlig enn på lenge. En rekke land bruker store ressurser på å skaffe seg tilgang til varer og teknologi til støtte for egen militær kapasitetsbygging og utvikling av kjemiske, biologiske, radiologiske/kjernefysiske våpen.

Publisert 24. aug 2023



Indikatorer på ulovlige anskaffelser

Vær på vakt mot forespørsler som er avvikende når det gjelder form, innhold og alminnelig forretningskikk.

Eksempler kan være:

- Kunden er ukjent eller det er usikkert hvem kunden egentlig er. Indikasjoner kan være manglende kredittopplysninger, lite eller ingen informasjon på internett eller at kunden kun oppgir postboksadresse.
- Kunden er motvillig eller unnvikende til å gi opplysninger om sluttbruker, hvor utstyret skal installeres og service- eller vedlikeholdsavtaler.
- Et allerede etablert kundeforhold endrer karakter ved at kunden ønsker andre varer eller tjenester som kan være problematiske eller sensitive, såkalt eskalerende anskaffelsesvirksomhet.
- Et spedisjonsfirma, havn eller lager oppgis som endelig destinasjon.
- Det er uvanlige ønsker til emballasje, fraktruter, pakkseddel, deklarerer eller betaling.
- Produktet passer ikke inn i formidlerens/kjøperens ordinære virksomhet, eller noe bryter med mønsteret for tidligere kontakt og kundeforhold.
- Kjøperen ber om uvanlig små eller store kvanta, uvanlig høy kvalitet i forhold til oppgitt bruk, osv.
- Kunden representeres av «fikser» eller mellommenn med dårlig kunnskap om varen eller bruken av dem. Disse kan være basert i Norge, Europa eller andre deler av verden.
- Når personell fra ambassaden til landet kunden kommer fra er uvanlig aktive eller stiller garantier for kunden.
- Kunden nøler eller trekker seg når det gjøres oppmerksom på at varene som etterspørres er underlagt eksportkontroll eller når dere ber om bedre dokumentasjon.

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Elements

More important than ever



Proceed With Care!



Inter linked



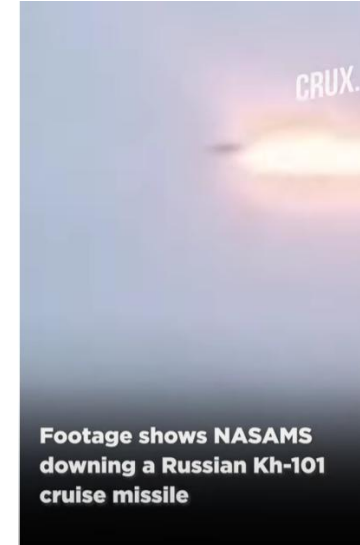
Norway provides Ukraine with NASAMS ground-based air defence system

News story | Date: 10/03/2023
[See on norsk](#)

Norway will provide Ukraine with two complete NASAMS firing units in cooperation with the United States. – Ukraine has a critical need to defend itself against missile attacks, and Norway will assist, says Norway's minister of defence, Mr. Bjørn Arild Gram.



Bjørn Arild Gram met president Volodymyr Zelenskyy in Kyiv. Credit: www.president.gov.ua



20 January, 2024

Wreckage of the North Korean KN-23/KN-24 missile that Russia fired at the Ukrainian city of Kharkiv on January 2, 2024. Ukraine. Photo credits: Conflict Armament Research (CAR)

Conflict Armament Research (CAR) field investigation team found North Korean marks on a "Russian" missile



DAMIEN SPLEETERS OF CONFLICT ARMAMENT RESEARCH WORKS ON A DOWNED RUSSIAN ORLAN-10 DRONE IN UKRAINE. IMAGE: COURTESY OF DAMIEN SPLEETERS



This Iranian made Qaem-5 precision guided munition was retrieved from the battlefield in Ukraine. It was made in May 2022, months after the invasion started. (IMAGE: Conflict Armament Research)

Damien Spleeters · 1.
Deputy Director Of Operations at Conflict Arm...
21t · 🌐

BIS recently updated its Entity List with 49 entities. Conflict Armament Research had previously identified seven companies among these, during our investigations into the diversion of components to Russia, stemming from our documentations of Russian weapon systems used in Ukraine. <https://lnkd.in/eUawxFra> Again, great to see correlations here with our work!

FEDERAL REGISTER
The Daily Journal of the United States Government

Addition of Entities to the Entity List
[federalregister.gov](https://www.federalregister.gov) · 2 min · lesetid

Russia modifies Shahed drones with Starlink antennas

NEWS · AVIATION · By Dylan Malyssov · Sep 25, 2024
Modified date: Sep 25, 2024



Captures via Telegram/ Polkovnyk GSH

Ukrainian forces have reportedly destroyed a Russian Shahed-136 long-range attack drone equipped with a Starlink satellite communication terminal.

Trade Compliance Project



Started in June 2019 to share best practices, benchmark on trade compliance topics



Already achieved many of our initial objectives



Has raised and improved awareness across 15 legal entities during the Audits (Phase II), created an incredible network in our Companies.



Was recognized with an Award in December 2021, inspiring other Companies to do Compliance collaboration.

About The Trade Compliance Project



Trade Compliance Project Audit Team



Rosa Rosanelli is VP and Head of Compliance in Patria.

Rosa is also Project Lead for the "Trade Compliance Project" and chair the ASD Export Control Committee.

A Lawyer specialized in export controls, Rosa holds a Master in Law of Air, Space and Telecommunications at Paris XI University and a Master in International Relations (International Law) at Rome La Sapienza University. She is currently also enrolled in an Executive MBA program.

TRADE COMPLIANCE PROJECT



Lars Løken former Director of Export Control Licensing at the Norwegian Ministry of Foreign Affairs.

Coordinating Defence and Dual-Use licensing processes and decision making, development of destination country policies and industry outreach.

Military background including NATO headquarters.

Master in law from University of Oslo



Tyler Nielsen is the CEO of Sanctions Advisory.

He previously served with the US Department of the Treasury, US Department of State, US Embassy Helsinki and most recently as the Head of Advisory - Sanctions at Nordica.

Tyler brings unique insights on the formulation of sanctions policy and application of sanctions enforcement.



EXPORT CONTROLS COMPLIANCE TEAM OF THE YEAR (Medium-size)

Winners Patria Kongsberg

It was a closely fought battle, but our winner is the "Trade Compliance Project", a cooperation between the Patria (Finland-based) and Kongsberg (Norway-based) company trade compliance groups. We applied this innovative approach to building compliance performance through collaborating with supplier organizations.

The Trade Compliance Project came into the world in June 2019 as the companies sought to join forces to strengthen their trade compliance programmes and achieve a new holistic approach to export compliance, improving competence and systems for trade compliance and sharing best practices. The collaboration was seen as especially important for Kongsberg Active Business Services, where there is shared ownership between Kongsberg and Patria.

The declared objectives of the project are to:

- Raise awareness on the criticality of trade compliance for current and future business;
- Establish a strong company culture of export compliance by setting it as a top priority;
- Make export compliance an integral and natural part of the way the companies conduct business, and ensure it is "baked top-of-mind" for company employees;
- Leverage company skills, setting up a new group of skilled personnel to exchange best practices, establish a network and implement export compliance across each company.





Captures via Telegram/ Polkovnyk GB

Ukrainian forces have reportedly destroyed a Russian Shahed-136 long-range attack drone equipped with a Starlink satellite communication terminal.



KONGSBERG

Thank you

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