Export Control and Sanctions

How we keep to export control and sanctions law.

VERSION 2 17 NOVEMBER 2026 ENGLISH PUBLIC

01 Purpose and scope

Our software and the technology behind it can be controlled for export. This policy applies to every product, update, piece of source code, technical document and service we supply, and to every person who works for AVVI.

In this document, “AVVI”, “we” and “us” mean the company named in the imprint on avvi.ch/legal and the companies in its group.

02 The law we follow

We follow the export control and sanctions law of every country where we develop or supply our products. In the European Union this includes the rules on military items, Regulation (EU) 2021/821 on dual-use items, and the EU sanctions regulations. Where another country’s rules also apply, for example to a part we use, we follow them too.

03 Classification

Each product and each significant version is classified before it is supplied, and the classification is confirmed by a specialist before the first export. Adhara may fall under the military or the dual-use controls. Encryption in REN, Feint and HF4 can make them dual-use items under category 5 of Regulation (EU) 2021/821.

04 Licences

We supply a controlled item only with the licence the law requires, only to the end user and for the end use the licence allows, and we keep to every licence condition. Before supply we may ask for an end-user certificate and proof of authorisation.

05 Screening

Before we supply or work with anyone, we check customers, end users, partners and suppliers against the sanctions lists that apply to us, and we look for warning signs: an unusual route, a vague end use, a reluctance to share information, a request to remove a safety function.

We do not supply Russia or Belarus, or anyone for use there, and we do not supply any person or country where that would breach sanctions.

06 Technology and source code

Sending technical data, sharing source code, giving remote access or a demonstration abroad can be an export. We check these like a shipment. Management reviews technical content before it is published, including on our website. Laptops and media taken abroad carry only what is cleared for that country.

07 Records

We keep export records, licences, end-user documents and screening results for as long as the law requires, and for at least five years.

08 Training

Everyone whose work touches exports is trained when they join and every year after that.

09 Breaches

Anyone who suspects a breach must report it at once to Management or through our Speak-up Policy (AVVI-POL-003). We stop the activity, investigate, and make a voluntary disclosure to the authorities where that is right or required.

10 Ownership

Management owns this policy and reviews it every year and whenever the law changes.

Version 2 replaces version 1 of 1 November 2026. AVVI now makes software only; the parts about our own interceptor are removed.

The current version of this document is published at avvi.ch/docs/avvi-export-sanctions.pdf. If you have a question about it, write to us through avvi.ch/contact.