

# U.S. Export Compliance

Exports and re-exports of Trellix products are subject to U.S. export controls and sanctions administered by the Commerce Department's Bureau of Industry and Security (BIS) under the U.S. Export Administration Regulations (EAR).

This page offers export control information for Trellix software and hardware products, which include encryption features subject to the EAR and other U.S. laws. These features have been approved for export from the U.S. subject to certain requirements and limitations. The information here can help you determine exportability to specific countries or parties and complete export/shipping documentation, recordkeeping, or post-shipment reporting.

Although we provide the information on this page, you remain responsible for exporting or re-exporting Trellix software in accordance with U.S. law. We encourage you to seek appropriate legal advice and/or consult the EAR and the BIS Information Technology Controls Division before exporting, re-exporting, or distributing Trellix software and hardware. Note that the information provided is subject to change without notice.

## Definitions

The following information on definitions is based on U.S. Export Administration Regulations (EAR). For more information on the EAR, visit the [Bureau of Industry and Security \(BIS\) website](#) or contact its offices directly at one of the phone numbers listed below:

- BIS Office of Exporter Services: 202-482-4811
- BIS Western Regional Office: 949-660-0144
- BIS Northern California Office: (408) 998-8806

### **Re-export of Trellix items**

U.S. and non U.S. companies re-exporting Trellix products or technology must comply with both their local export rules and with U.S. re-export regulations. Guidance regarding re-exports and other offshore transactions involving items of U.S. origin can be found on [the Bureau of Industry and Security website](#).

## Embargoed Destinations

Trellix products may not be exported or re-exported, either directly or indirectly, to any country embargoed by the United States, or to any country considered by the United States as a supporter or international terrorism, without proper authorization from the U.S. government. Cuba, Iran, North Korea, Sudan, Syria, and Crimea, Donetsk, Luhansk, and Regions of Ukraine are embargoed destinations.

## U.S. Prohibited and/or Restricted Lists

Trellix products may not be sold, exported, or re-exported to any person or entity designated as prohibited or restricted by an agency of the U.S. government. Exports to companies, organizations, or persons listed on the Specially Designated Nationals List, the Debarred List, the Entity List, and other governmental lists are prohibited. Please review the list of parties of concern <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern>

## Enhanced Proliferation Control Initiative

Trellix products may not be used directly or indirectly in the design, development, fabrication, or use of nuclear, chemical, or biological weapons or missile technology without U.S. government authorization.

## Commodity Classification Automated Tracking System (CCATS)

The BIS uses the Commodity Classification Automated Tracking System (CCATS) to assign code numbers to products it has classified against the Commerce Control List (CCL). The CCL contains items subject to BIS export license requirements. Trellix lists CCATS numbers on our product matrix.

## Deemed Export

A [deemed export](#) is any release of technology or source code, subject to the EAR, to a foreign national within the United States. Such a release is deemed to be an export to the home country or countries of the foreign national. This deemed export rule does not apply to persons lawfully admitted for permanent residence in the United States or to persons who are protected individuals under the Immigration and Nationality Act, 8 U.S.C. § 1324b(a)(3). Additional information on deemed exports can be found on the [BIS website](#).

Technology or software is released for export through:

- Visual inspection by foreign nationals of U.S.-origin equipment and facilities.
- Oral exchanges of information in the United States or abroad.
- The application to situations abroad of personal knowledge or technical experience acquired in the United States.

Delivery of Trellix cryptographic products does not imply third-party authority to import, distribute, or use restricted and non-restricted encryption.

All importers, distributors, customers, and users are responsible for complying with both U.S. and local export laws. We strongly advise you to investigate these regulations thoroughly before deploying any encryption products. For detailed information on international export requirements, Trellix recommends consulting your local freight forwarder, consultant, or attorney.

Trellix products may not be used directly or indirectly in the design, development, fabrication, or use of nuclear, chemical, or biological weapons or missile technology without U.S. government authorization.

## **Export Control Classification Number (ECCN)**

An Export Control Classification Number (ECCN) is assigned to a product by the BIS. An ECCN is an alphanumeric classification used in the EAR under the Commerce Control List (CCL) to identify items for export control purposes.

The BIS uses the Commodity Classification Automated Tracking System (CCATS) to assign code numbers to products it has classified against the Commerce Control List (CCL). The CCL contains items subject to BIS export license requirements. Trellix lists CCATS numbers on our product matrix.

## **ENC/Restricted (Civilian/Commercial End Users)**

ENC/Restricted products may be exported or re-exported to most civilian and commercial end users located in all territories, except embargoed destinations and countries designated as supporting terrorist activities. Countries listed in Part 746 of the EAR as embargoed destinations requiring a license are Cuba, Iran, North Korea, Sudan, Syria, Russia, Belarus and Crimea, Donetsk, and Luhansk Regions of Ukraine.

## **ENC/Restricted (Government End Users)**

Government entities not located in the following countries require a U.S. export license in order to obtain restricted non-retail strong encryption items: Austria, Australia, Belgium, Bulgaria, Canada, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Japan, Latvia, Lithuania, Luxembourg, Malta, Netherlands, New Zealand, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, United Kingdom, and United States.

## **ENC/Unrestricted**

ENC/Unrestricted products are eligible for export to any end user, including government, in all countries except the following embargoed countries: Cuba, Iran, North Korea, Sudan, Syria, Russia, Belarus and Crimea, Donetsk, and Luhansk Regions of Ukraine.

## Foreign Nationals

Any person born outside the jurisdiction of the United States, subject to a foreign government, and not naturalized under U.S. law is considered a foreign national. This includes foreign national contractors and vendors. For the purposes of the EAR, a foreign national subject to the U.S. deemed export rule is not a citizen of the United States and not a legal permanent resident (i.e., not a permanent resident alien or green card holder).

A U.S. export license may be needed before disclosing certain kinds of software or technology to a foreign national if:

- The software or technology is export-controlled.
- The individual is a citizen of one or more of the following countries: Cuba, Iran, North Korea, Sudan, Syria, or Crimea, Donetsk, and Luhansk Regions of Ukraine.

## Government End User

Foreign central, regional, or local government department, agency, or other entity performing governmental functions.

## License Exception

An authorization described in part 740 of the EAR that allows the export or re-export, under stated conditions, of products subject to the EAR that otherwise would require a license. Unless otherwise indicated, these License Exceptions are not applicable to exports under the licensing jurisdiction of agencies other than the Commerce Department.

## Mass Market/NLR

Mass Market products are eligible for export with No License Required (NLR) to any end user (including government) in all countries except embargoed countries and those that are designated by the United States as supporters of international terrorism: Cuba, Iran, North Korea, Sudan, Syria, Russia, Belarus and Crimea, Donetsk, and Luhansk Regions of Ukraine. Mass Market products are eligible for de minimis treatment.

## ECCN, HTS, and License Product Matrix—Trellix Software & Hardware

The following matrix delineates information pertaining to Trellix's products in relation to the Export Administration Regulations (EAR) and the Commerce Control List (CCL). This information is intended to serve Trellix's customers and should be used in conjunction with independent legal counsel. Trellix does not represent or warrant the accuracy or reliability of the

classifications within the Product Matrix. The use of these classifications is undertaken without recourse to Trellix and at the user's own risk.

- [Product Matrix by product name with ECCN, HTS and General License information](#)
- [Product Matrix by product SKU with ECCN, HTS and General License information](#)

## **Important Notice & Disclaimer**

Trellix is providing this information as a general guideline to our customers and partners, and makes no warranties or representations as to its accuracy. The Bureau of Industry and Security (BIS) requires that all entities involved in exporting products are responsible for understanding and fully complying with the affirmative obligations outlined in the Export Administration Regulations (EAR). Please note that the EAR is subject to change. We advise customers and partners to seek legal counsel before attempting to export. In addition, some of our products contain encryption and some countries may restrict certain levels of encryption imported into their country. We recommend that customers and partners consult legal counsel in the appropriate country or the applicable governmental agency in the particular country to which they are exporting. Trellix disclaims any liability for any damages, whether direct, indirect, incidental, special, or consequential, arising from the use of this information.

If you have questions regarding the information on this page, please contact us at [export@Trellix.com](mailto:export@Trellix.com).