

# Parent Company "Best Effort" obligation

Enhanced due diligence for operators manufacturing and/or trading with CHP items  
*§3 of Article 12gb of Council Regulation 833/2014*

## Public Declaration

Cefla North America declares its intention not to engage in activities that risk undermining EU sanctions or the compliance and governance policies of its Parent Company Cefla S.C. (Italy), as EU operator and owner of CNA.

CNA declares to comply with the laws of the United States regarding sanctions against Russia and also with the Sanctions against Russia in force in the European Union. In particular, it adheres to the requirements of art. 12g of Regulation (EU) 833/2014 and undertakes not to export outside the United States the Dual Use materials and the Common high priority (CHP<sup>1</sup>) items, listed in Annex XL of Regulation (EU) 833/2014.

CNA also commits to sell these goods within the United States only to end-users in its business sector and will not sell to persons engaged in trade in Annex XL related goods, unless it receives a signed declaration that such goods will not be exported from the United States to or for use in Russia.

**Giuseppe Scazziotà**  
*Managing Director*  
**Cefla North America**

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<sup>1</sup> Common high priority (CHP) items are certain prohibited dual-use goods and advanced technology items used in Russian military systems found on the battlefield in Ukraine or critical to the development, production or use of those systems. These items are listed in Annex XL to Regulation (EU) No 833/2014 and the Parent Company keeps the list updated on the company management system (JDE Oracle)