

# Data subject to export control

This document consolidates information from multiple sources to provide a clear and concise definition—specifically for SyWay—of the types of data and information that may be subject to various export controls.

**i** While this content has been reviewed by both Global Trade Compliance and IT Cybersecurity, the final authority for all export control decisions rests with the Exports Controls & Sanctions Team, which is structured within the Compliance Organization (see contact details at the end of this document).

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## Export Controlled Goods

Controlled goods are items, materials, or software that are subject to government regulation due to their potential military applications, strategic importance, or risk of misuse. This category includes both:

- **Military Goods:** Items specifically designed or modified for military use, such as weapons, military vehicles, defense electronics, and related technologies.
- **Dual-Use Goods:** Items, software, or technology that are primarily intended for civilian use but can also have military or strategic applications. Examples include certain chemicals, electronics, materials, and manufacturing equipment.
- Controlled goods may not be exported, transferred, or shared (including electronically) without proper authorization, such as an export license, from the relevant national authority.
- The scope of control includes not only physical items but also associated technical data, software, and technology.
- Information that is publicly available or intended solely for basic marketing purposes is generally excluded from these controls.

## Export Controlled Technologies

Government regulations govern not only the physical transfer of controlled goods, but also the transmission of “technology”—that is, technical information—associated with those goods.

**According to the Wassenaar Arrangement**, “technology” is defined as technical information necessary for the “development,” “production,” or “use” of controlled items. This information may also be provided in the form of technical data or technical assistance.

- **Technical data** may include blueprints, plans, diagrams, models, formulae, tables, engineering designs and specifications, manuals, or instructions (written or recorded on other media). See below “Illustrative List of Documents Potentially Containing Controlled Technology”
- **Technical assistance** may involve instruction, skills training, working knowledge, or consulting services.

**For dual-use items**, technology includes any information required for the development, production, use, operation, installation, maintenance, repair, overhaul, or refurbishment of dual use items. “Required technology” refers to the portion of the technology which is essential for achieving the controlled performance levels of a dual use item.

**For ITAR (US Military) purposes**, controlled data also includes: (i) Information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of defense articles, in any form such as blueprints, drawings, photographs, plans, instructions, or documentation; (ii) Classified information related to defense articles and defense services on the U.S. Munitions List and 600-series items on the Commerce Control List or other munitions lists; (iii) Information covered by an invention secrecy order; and (iv) software directly related to defense articles. At this point in time only the Composite Materials GBU is in possession of ITAR technologies. All these technologies are of US origin.

**Information in the Public domain:** Importantly, information that is “in the public domain” or consists of general marketing materials describing a product’s function or purpose is typically excluded from export controls and is not considered controlled “technology.” Examples of public domain information include general scientific, mathematical, or engineering principles commonly taught in schools, colleges, and universities; telemetry data; basic marketing information about a product’s function or purpose; and general system descriptions of defense articles.

## Illustrative List of Documents Potentially Containing Controlled Technology

The following is a list of illustrative, non-exhaustive examples of Technical Information which *may* contain controlled technology.

- Specifications
- Drawings
- Bill of Materials/Recipes
- Routings
- Product Compositions
- Inspection Plan

- Spec Limits, Characteristics, etc.
- Work Instructions
- Test Methods
- PCDs & Resin mix standards
- Resin mix recipe management & standards
- Purchase/Receipt Specifications with US military spec references (e.g. JSF)
- Customer presentations containing technical data
- BOM Costing / Production Order Reports
- Technical/Qualification Reports
- Advance Change Notice (ACN)
- Work packets
- Test Requests / Lay up sheets
- Customer Complaints containing technical data
- Process Flow Diagrams
- Manufacturing Process Descriptions
- Software Source Code or Algorithms
- Simulation Models and Results
- Calibration Procedures
- Maintenance and Repair Manuals for equipment that is export-controlled
- Training Materials containing technical content
- Research and Development (R&D) Reports
- Technical Emails and Correspondence
- Supplier Qualification Documents
- Engineering Change Orders (ECOs)
- Validation and Verification Protocols
- Technical Meeting Minutes
- Material Safety Data Sheets (MSDS) with proprietary formulations
- Prototype or Pilot Production Data
- Export License Applications and Supporting Documentation
- Technical Risk Assessments
- Failure Analysis Reports
- Equipment Setup and Configuration Files

If an item is subject to an export control regime (see below), the related documents listed above are likely to contain controlled technology and, therefore, may be subject to export controls—unless an exemption applies or the information is publicly available.



The above presents an illustrative, non-exhaustive list of information that is commonly subject to export controls. To be certain about whether or not a particular piece of information is subject to export controls requires detailed examination of the information by a member of the Exports Controls & Sanctions Team (see contact details at the end of this document).

## Management of Syensqo Export Controlled Technologies

Management of Export Control Data must be done in accordance with the Syensqo [Data Governance Policy for Safeguarding Controlled Technical Information in Digital Platforms](#) (Note: as of 27 January 2026 this document is still under review and thus not yet widely visible)

Syensqo Export controlled technologies are defined in [Appendix 26 - Group Technology Control Map](#)

## Relevant Export Control Regimes

### The United States Export Control Regime

The following links provide important information on ITAR and U.S. Dual Use regulations.

- [International Traffic in Arms Regulations](#) (ITAR) are a set of United States government regulations that control the export, import, and transfer—whether physical, electronic, or verbal—of defense articles, defense services, and related technical data as specified on the United States Munitions List (USML) and the 600 series code of the US EAR Commerce Control list. ITAR also covers items and technology that are specifically designed, developed, or modified for military use, even if not explicitly listed on the USML. The purpose of ITAR is to safeguard U.S. national security and foreign policy interests by ensuring that sensitive military technologies and information are not accessed by unauthorized foreign persons or entities.
- ITAR items or defense articles are listed in the following two list of controlled items: (a) [US Munitions List](#), and (b) [600-series code](#) on the [Commerce Control List](#), i.e. where the third character of the Export Control Classification Number (ECCN) is a '6' - for example **9A610** *Military Aircraft and Related Commodities*.
- ITAR definition of [Technical data](#)
- The [Export Administration Regulations \(EAR\)](#) are a set of United States government regulations administered by the Department of Commerce that control the export, re-export, and certain in-country transfers of commercial, dual-use, and some military items, as well as related technology and software. Items subject to the EAR are listed on the Commerce Control List (CCL) and include products, materials, equipment, software, and technology with both civilian and potential military or proliferation applications. The EAR primarily applies to exports from the United States to foreign countries, re-exports between foreign countries, and transfers between parties within a foreign country. Transfers of items and technologies within the United States are generally not subject to the EAR's export controls, except in cases involving a "deemed export" (such as the release of controlled technology to a foreign national in the US). The purpose of the EAR is to protect U.S. national security, foreign policy, and economic interests by regulating the transfer of sensitive goods, technology, and information to foreign persons and destinations.

- Dual-use items and technologies subject to the Export Administration Regulations (EAR) are listed on the [Commerce Control List \(CCL\)](#), which covers a broad range of commercial, dual-use, and certain military items ([600-series code](#)).

## The United Kingdom Export Control Regime

The following links provide important information on ITAR and U.S. Dual Use regulations.

- The [UK 2008 Export Control Order](#) are a set of laws and regulations administered by the UK government that control the export, transfer, and certain in-country activities involving military, dual-use, and other strategically sensitive items, as well as related technology and software. Items subject to UK export controls are listed on the [UK Strategic Export Control Lists](#), which include the UK Military List and the UK Dual-Use List. These lists cover products, materials, equipment, software, and technology that have military, security, or both civilian and military (dual-use) applications. The UK export control regulations primarily apply to exports from the United Kingdom to other countries, as well as certain transfers and disclosures of controlled technology to foreign nationals, even if these occur within the UK (commonly referred to as “deemed exports”). Transfers of items and technology within the UK between UK persons are generally not subject to export controls, unless the transfer involves a foreign national or is otherwise specified by law. The purpose of the UK export control regulations is to protect national security, support foreign policy objectives, and prevent the proliferation of weapons and sensitive technologies by regulating the movement and sharing of controlled goods, technology, and information with foreign persons and destinations.
- Military and Dual-use items subject to UK export control regulations are controlled under the UK Strategic Export Control Lists of the [2008 Export Control Order](#)

## The European Union Export Control Regime

The following link provide important information on EU Dual Use regulations:

- The [EU Dual-Use Regulation \(EU\) 2021/2008](#) governs the export, transfer, brokering, and transit of dual-use items—goods, software, and technology that can be used for both civilian and military purposes—within the European Union. The regulation establishes a common control system to prevent the proliferation of weapons of mass destruction and to enhance international security, while also facilitating legitimate trade. Dual-use items are listed in the EU Dual-Use Control List, and their export outside the EU may require authorization to ensure that sensitive technologies do not fall into the wrong hands or contribute to activities contrary to EU and international security interests. This regulation list all dual use items.
- The [Council Common Position 2008/944/CFSP](#) outlines the common EU list of military items. Additionally, individual EU member states may designate further goods for control on a national basis.

## China

An [investigation](#) conducted by Trade Compliance in October 2024 concluded that no information stored in ERP systems was subject to export controls in China.

Although the manufacturing technology of one product has been classified as controlled dual-use technology in China, an analysis of the Bill of Materials of that product concluded that the Bill of Materials itself was not controlled data as it only identifies the ingredients that are used in the manufacturing, which is publicly available information. Specific manufacturing process informations used by plant operators in the manufacturing process may be controlled, however this is not stored in ERP.

## Contact Information

For any further clarification or request of advice regarding Syensqo ITAR and Dual Use technologies please contact:

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