EXPORT CONTROLS & SANCTIONS POLICY

Integrity

HARMAN COMPLIANCE
CONNECTED BY INTEGRITY

Purpose

HARMAN International Industries, Inc. and all of its businesses and subsidiaries worldwide ("HARMAN" or the "Company") is committed to complying with all applicable U.S. and non-U.S. export controls, economic sanctions, and trade restrictions.

HARMAN strictly complies with U.S. export control and sanctions laws and regulations, including but not limited to the Export Administration Regulations ("EAR"), regulations administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), applicable antiboycott provisions, and relevant laws and regulations of other jurisdictions in which the Company operates.

Certain countries and regions are subject to comprehensive or targeted restrictions, and HARMAN is prohibited from engaging in business with such jurisdictions, directly or indirectly, except as authorized by applicable law or government license. These currently include **Afghanistan, parts of the Balkans, Belarus, Cuba, Iran, Myanmar (Burma), the Central African Republic, the Democratic Republic of the Congo, Iraq, Lebanon, Libya, Mali, Nicaragua, North Korea, Russia, Somalia, South Sudan, Sudan, Syria, Venezuela, Zimbabwe, Yemen, and the Crimea, Donetsk, and Luhansk regions of Ukraine**. The scope and applicability of these restrictions may change over time; questions regarding current restricted jurisdictions or the permissibility of specific activities must be directed to Legal & Compliance.

This Policy is designed to ensure that HARMAN conducts its global operations in a manner consistent with applicable trade compliance requirements.

Scope & Applicability

This mandatory Policy applies to all HARMAN employees, officers, directors, subsidiaries, and third parties acting on behalf of HARMAN, regardless of location (collectively, "HARMAN Personnel"). Non-compliance may, consistent with applicable law, result in disciplinary action up to and including termination.

Policy Statement

HARMAN will not engage in, authorize, or facilitate any transaction or activity that violates applicable export control, economic sanctions, or trade restriction laws. Specifically, the Company will not:

- Export, reexport, transfer, or release goods, software, technology, or services without required government authorization or in violation of applicable license conditions;
- Conduct business, directly or indirectly, with individuals, entities, vessels, or countries that are subject to comprehensive or targeted sanctions, embargoes, or other trade

restrictions, unless expressly authorized by law or government license;

- Participate in or comply with any unsanctioned foreign boycott or discriminatory trade practice prohibited under U.S. antiboycott laws;
- Evade, circumvent, or attempt to avoid applicable export controls or sanctions through intermediaries, third parties, or indirect transactions;
- Provide technical assistance, software updates, cloud access, or after-sales support where such activity would constitute a prohibited export or services transaction.

All HARMAN Personnel must ensure that transactions, services, and technology transfers comply with applicable sanctions laws and regulations, including restrictions on end-users, destinations, and end-uses.

Prohibited Transactions & Activities

Unless expressly authorized by law or government license, HARMAN will not engage in transactions that:

- Involve sanctioned countries, regions, governments, or regimes subject to comprehensive or sectoral sanctions;
- Involve individuals or entities designated on applicable sanctions or denied party lists;
- Support prohibited military, surveillance, nuclear, missile, chemical, or biological end uses;
- Facilitate the diversion or unauthorized reexport of HARMAN products, software, or technology;
- Include contract terms, letters of credit, or documentation that impose sanctions- or boycott-related obligations inconsistent with applicable law.

High-Risk Areas & Transactions

HARMAN Personnel should exercise heightened diligence in transactions involving:

- High-risk jurisdictions subject to sanctions, export controls, or heightened enforcement scrutiny (Iran, North Korea, Cuba, Russia, Belarus, etc. Contact Legal & Compliance for a current list of jurisdictions);
- Technologies with dual-use potential or advanced connectivity, AI, autonomous, or cybersecurity features;

- Software, firmware, source code, and over-the-air updates;
- Distributors, system integrators, and aftermarket service providers operating across multiple jurisdictions.

For any requests related to sanctioned or high-risk jurisdictions, screening, or due diligence, please contact Legal & Compliance at Harman_Export@harman.com. Transactions involving elevated risk must be reviewed and approved by Legal & Compliance prior to execution.

Due Diligence & Compliance Measures

HARMAN's approach to export controls and sanctions compliance is based on proactive risk assessment, employee training, and monitoring, including:

- Risk-based assessments of products, technologies, customers, and markets;
- Mandatory training for employees;
- Contractual compliance obligations for distributors and partners;
- Recordkeeping consistent with applicable legal requirements;
- Prompt escalation and investigation of suspected violations or red flags;
- Reporting to relevant authorities as required by law.

Raising Concerns

All HARMAN Personnel must immediately report any potential, suspected, or actual violations of this Policy to their manager, Human Resources, Legal & Compliance at **compliance@harman.com**, or via the HARMAN Speak Up Hotline. All reports will be treated as confidential to the extent possible and as permissible by law. Reports may be made by employees, suppliers, or external stakeholders, and retaliation against good faith reporting is strictly prohibited. The Company will accept and review anonymous reports where permitted by local law.

HARMAN Speak Up Hotline
• Online: speakup.harman.com • By Phone: +1 (800) 563-4037 (U.S.); If dialing internationally, please visit the speakup.harman.com click call now and select your country location • By email to compliance@harman.com • Available 24/7 • Reports can be made anonymously (where permitted by law)

Policy Oversight & Questions

The Legal & Compliance Department provides oversight, and progress is reviewed by executive management and the Board. Questions regarding this Policy should be directed to the Legal & Compliance Department at **Harman_Export@harman.com**.

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Change History

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