



## Product Notification CSB #136

To: Sensitech Customers  
From: Patrick Riordan, Sr. Manager, Regulatory and Compliance  
Date: 17 October 2023  
Re: Trade Controls and Geographic Restrictions Applicable to Sensitech Devices

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### Valued Customer

In light of recent updates to the sanctions and export controls, Sensitech would like to take the opportunity to remind you of relevant information regarding our devices as it concerns trade controls and contractual geographic restrictions.

Sales and distribution of commodities, materials, hardware, software, services, and technology received by customers from Sensitech (the “Product”) may constitute an export, reexport, or transfer, and such transactions must be conducted in accordance with the export control, trade, and economic sanctions laws and regulations of the government authorities with jurisdiction over such activities, including the European Union and its Member States, the United States, and the United Kingdom (collectively, “Trade Control Laws”). Further, from time to time, for reasons of policy due to anti-corruption, anti-terrorism, trade compliance, and anti-money laundering, Sensitech may designate countries or territories as “Sensitech Restricted Countries” and contractually prohibit business with such countries or territories.

While we are not in a position to provide legal advice to our customers, we would like to make you aware of information that may be relevant to your own compliance analysis.

### Sensitech Restricted Countries

Per our terms and conditions, Sensitech Products may not be used in Sensitech Restricted Countries, which may be updated from time to time in writing in the terms and conditions. At this time, this list includes Cuba, Iran, North Korea, Syria, and the Crimea, Donetsk, Kherson, Luhansk, and Zaporizhzhia regions of Ukraine. Further, per our terms and conditions, our customers may not sell, supply, export, reexport, or transfer Products directly or indirectly to an individual or entity (i) ordinarily resident in, or incorporated under the laws of, a Sensitech Restricted Country; (ii) the Government of a Sensitech Restricted Country; (iii) a party owned or controlled by a party in (i) or (ii); or (iv) a party acting on behalf of the foregoing.

### Real-Time/Connected Devices

Sensitech’s real-time/connected devices (attached to this letter in Annex I), are classified for export control purposes in the United States as ECCN 5A991. As it concerns trade with Russia and Belarus, these devices are also listed on export bans out of the EU and UK, among others. Accordingly, the export of these devices may be restricted under US export controls, and as it concerns Russia and Belarus, export and re-export is prohibited to these countries from anywhere in the world, absent a relevant exemption. This is true regardless of the country of export as they were developed using U.S. origin, controlled technology.

Sensitech classifies its real-time devices in Harmonized System (“HS”) subheading 9025.80.

### Other Devices

Sensitech has classified its other devices for export controls purposes as EAR99, or in the EU/UK as not dual-use.

We note that Sensitech has received a binding customs ruling from Dutch Customs, classifying its temperature-only measuring devices in HS subheading 9025.19. Sensitech has very good support for the classification it was previously using, HS subheading 9025.80, and therefore continues to use HS subheading 9025.80 outside the EU and UK. Sensitech also classifies its dual-purpose (temperature and humidity) monitors in HS subheading 9025.80, globally. Based on its review of the Dutch Customs Ruling, Sensitech will be filing an appeal of the Dutch Customs ruling and will seek to reverse the ruling and return to an HS classification of subheading 9025.80. However, until further notice Sensitech will use HS subheading 9025.19 for all sales into and out of the EU and UK.



Accordingly, as it concerns Russia and Belarus: (1) temperature-only devices will be restricted for export to Russia when exported from the EU and UK, absent a relevant exemption, and (2) all devices are prohibited for export to Russia and Belarus when US export controls apply.

To assist in your compliance, we would like to provide the facts in Annex II, as relevant to our non-real time devices.

### **Denied Parties**

Per our terms and conditions, our customers may not sell, supply, export, reexport, or transfer Sensitech Products directly or indirectly to an individual or entity that is prohibited under Trade Control Laws from receiving the items, including, without limitation, (i) an individual or entity designated on the U.S. Department of the Treasury's Office of Foreign Assets Control's Specially Designated Nationals and Blocked Persons List, or the European Union's Consolidated List of Sanctions, and the UK Consolidated List; (ii) the Government of Venezuela or Afghanistan, (iii) an entity owned or controlled by a party in (i)-(ii), or (iv) a person acting on behalf of, or for the benefit of, a party in (i)-(iii) (Parties in subparagraph (i)-(iv) collectively, a "Denied Party").

### **Services**

Given the legal and contractual controls discussed above, Sensitech is under no obligation to service Products in a Sensitech Restricted Country, Belarus, or Russia, or Products that have been transferred to a Denied Party or the government of a Sensitech Restricted Country, Russia, or Belarus. This includes product support and any associated services, such as Sensiwatch, which we note is largely supported out of the United States.

### **Exceptions to the Above**

We understand given the nature of our customers, you may send your own products into these countries and territories on occasion. Should you have a license that also covers the use of Sensitech Products in support of this business, we may, on a limited basis, consider an exception to our terms.



**ANNEX 1  
REAL-TIME/CONNECTED DEVICES**

DEVICE TYPE	COUNTRY(IES) OF ORIGIN, NEW DEVICES	COUNTRY(IES) OF ORIGIN, REFURBISHED DEVICES	US/EU/UK HS	US ECCN	UK RUSSIA/BELARUS	EU RUSSIA/BELARUS
TempTale®GEO LTE	Mexico Thailand	United States	9025.80	5A991	5A991	X.A.III.101
TempTale®GEO LTE Extended	Mexico Thailand	United States	9025.80	5A991	5A991	X.A.III.101
TempTale®GEO Eagle(2G)	China Thailand	United States	9025.80	5A991	5A991	X.A.III.101
TempTale®GEO Eagle Extended	China Thailand	United States	9025.80	5A991	5A991	X.A.III.101
TempTale®GEO Eagle 3G	China Thailand	United States	9025.80	5A991	5A991	X.A.III.101
TempTale®GEO Ultra Dry Ice Probe	Thailand	N/A	9025.80	5A991	5A991	X.A.III.101
TempTale®GEO Ultra Extended	Thailand	United States	9025.80	5A991	5A991	X.A.III.101
TempTale®GEO Ultra	Thailand	United States	9025.80	5A991	5A991	X.A.III.101
VizComm™ View Ultra	Thailand	United States	9025.80	5A991	5A991	X.A.III.101
VizComm™ View LTE Extended	Mexico Thailand	United States	9025.80	5A991	5A991	X.A.III.101
VizComm™ View LTE	Mexico Thailand	United States	9025.80	5A991	5A991	X.A.III.101
VizComm™ View 2G	China Thailand	United States	9025.80	5A991	5A991	X.A.III.101
VizComm™ View Extended	China Thailand	United States	9025.80	5A991	5A991	X.A.III.101
VizComm™ View 3G	China Thailand	United States	9025.80	5A991	5A991	X.A.III.101
TempTale®Ultra BLE	China	N/A	9025.80	5A991	5A991	X.A.III.101
TempTale® RF	China Vietnam	United States	9025.80	5A991	5A991	X.A.III.101
TempTale® RF Gateway	Thailand	N/A	9025.80	5A991	5A991	X.A.III.101
TempTale® RF Signpost	Thailand	N/A	9025.80	5A991	5A991	X.A.III.101
TempTale® RF Repeater	Thailand	N/A	9025.80	5A991	5A991	X.A.III.101



**ANNEX II  
NON-REAL-TIME/NON-CONNECTED DEVICES**

PRODUCT NAME	COUNTRY(IES) OF ORIGIN NEW DEVICES	GREATER THAN 25%US CONTENT? NEW DEVICES	COUNTRY(IES) OF ORIGIN, REFURBISHED DEVICES	GREATER THAN 25% US CONTENT? REFURBISHED DEVICES	US HS	EU/UK HS	US ECCN	EU/UK DUAL USE STATUS
Ryan® EZT	US	Yes	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
Ryan® CR-1 Alkaline	US	Yes	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Ultra 16K AMB	Bulgaria China Serbia Vietnam	No	US Bulgaria China	US: Yes Bulgaria: No China: No	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Dry Ice AMB	China Serbia Thailand	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Ultra Fit	China Bulgaria	No	US Bulgaria China	US: Yes Bulgaria: No China: No	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Ultra Bio	Serbia	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Ultra Probe	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Ultra Probe less Dry Ice	Thailand Serbia China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Ultra Humidity	China	No	N/A	N/A	9025.80	9025.80	EAR99	Not Dual Use
TempTale® Ultra (64K)	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Ultra Dry Ice Probe	China	No	US	Yes	9025.80	9025.19	EAR99	Not Dual Use
TempTale®4	Vietnam China	No	US Mexico Bulgaria	US: Yes Mexico: No Bulgaria: No	9025.80	9025.19	EAR99	Not Dual Use
TempTale®4 Multi-Alarm (non-USB)	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale®4 Bio	China US	China: No US: Yes	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use



TempTale®4 Humidity	China	No	N/A	N/A	9025.80	9025.80	EAR99	Not Dual Use
TempTale®4 Dry Ice Probe	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TagAlert® NFC	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
ThermoAlert™	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
FreezeAlert™	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TagAlert® + TagAlert® Enhanced	Vietnam China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
VaxAlert™	Vietnam	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale® Probe and Dual Sensor	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
TempTale®4 Probeless Dry Ice	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use
VaxAlert™ USB	China	No	N/A	N/A	9025.80	9025.19	EAR99	Not Dual Use