

# Luna Export Compliance Statement

**Effective Date:** May 1, 2025

**Last Updated:** May 1, 2025

Luna complies fully with all applicable **U.S. export control laws, economic sanctions regulations**, and other **global trade restrictions**. This policy applies to all users of Luna's Services, including our AI software, APIs, models, developer tools, deployment systems, and enterprise features.

## U.S. Export Control and Sanctions Compliance

Luna's software and cloud services may be subject to:

- The **Export Administration Regulations (EAR)** administered by the U.S. Department of Commerce's **Bureau of Industry and Security (BIS)**;
- The **International Traffic in Arms Regulations (ITAR)** enforced by the U.S. Department of State, where applicable;
- **Economic and trade sanctions** administered by the U.S. Department of the Treasury's **Office of Foreign Assets Control (OFAC)**.

These laws restrict the export, re-export, or transfer of controlled technologies, software, and services to certain **countries, entities, and individuals**.

## Prohibited Countries and Regions

You may **not use, export, re-export, or access** the Luna platform, Services, or related technologies:

- If you are located in or are a national/resident of a **sanctioned country or region**, including but not limited to:
  - **Cuba**
  - **Iran**
  - **North Korea**
  - **Syria**
  - **Russia (certain sectors)**
  - **The Crimea, Donetsk, and Luhansk regions of Ukraine**
- If you are identified as a prohibited or restricted party under any U.S. export law.

## Restricted Party Screening

Luna's Services may **not be accessed or used** by individuals or entities listed on any U.S. government restricted party list, including:

- [Specially Designated Nationals \(SDN\) List](#)  
(administered by OFAC — prohibits transactions with listed individuals/entities)
- [Denied Persons List](#)  
(administered by BIS — prohibits exports/re-exports to listed persons)
- [Entity List](#)  
(administered by BIS — designates companies/entities restricted from receiving U.S. items)

You must conduct your own screening processes to ensure compliance before integrating Luna into any systems involving exports, re-exports, or third-party access.

## Global Responsibilities

Luna's export compliance obligations extend globally. As a user, you are also responsible for ensuring compliance with:

- Your local or national import/export restrictions;
- Regional controls on **dual-use technologies, encryption software, or AI-enabled systems**;
- Any licensing or classification obligations in your jurisdiction.

## Your Responsibilities

By accessing Luna's Services, you represent and warrant that:

- You are **not a citizen or resident** of a country or region that is subject to comprehensive U.S. sanctions;
- You are **not listed** on the SDN List, Entity List, Denied Persons List, or any similar list issued by other governments;
- You will **not use Luna's Services for prohibited end-uses**, including:
  - Weapons development,
  - Surveillance technologies violating privacy rights,
  - Military or intelligence operations restricted by law.

You also agree not to:

- Export or re-export Luna's software or models into sanctioned territories;
- Share access to Luna's platform with prohibited third parties;

- Incorporate Luna into any project that violates U.S. or international trade laws.

### **Enforcement and Termination**

Luna reserves the right to:

- **Suspend, restrict, or terminate** access to our platform for any user, project, or account that violates this policy;
- **Report violations** to the appropriate government authorities;
- **Audit use cases or customer integrations** suspected of export control concerns.

Violations of export control laws may result in severe **civil or criminal penalties**, including fines and denial of export privileges.

### **Contact for Compliance Questions**

If you have questions about Luna's export classification, EAR applicability, or whether your intended use is compliant with these rules, please contact:

#### **Luna Legal & Compliance Team**

[legal@lunabase.ai](mailto:legal@lunabase.ai)

We encourage all enterprise users and global teams to consult with legal counsel to confirm your internal compliance obligations.