

# PAUL HASTINGS

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January 7, 2022

Lisa Peterson  
Acting Assistant Secretary  
Bureau of Democracy, Human Rights, and Labor  
U.S. Department of State  
2201 C Street NW  
Washington, DC 20520

Re: NSO Group

Dear Ambassador Peterson:

I am writing on behalf of NSO Group to request an opportunity to engage with you and your colleagues regarding the recent initiative announced by the U.S. Government at the Summit for Democracy to curb the proliferation of technology that has been misused by governments.

NSO is a technology company that only licenses technologies to vetted, U.S. and Israeli allied legitimate law enforcement and intelligence agencies for use in fighting terrorism and serious violent crimes such as human trafficking and the dissemination of child sexual abuse materials. While NSO does not operate the technology, these agencies have successfully used it to prevent terrorist shooting sprees, car explosions and suicide bombings, break up pedophilia and sex and drug-trafficking rings, as well as to find and rescue kidnapped children. NSO is regulated and subject to Israel's stringent export licensing requirements. In addition, NSO has developed internal protocols over a number of years, consistent with efforts to continuously improve its practices and align its conduct with the UN Guiding Principles on Business and Human Rights, to prevent the sale of its technology to customers who might misuse it, and take appropriate measures against those customers who do misuse it. The company has also sought to facilitate the development of standards for the industry and has advocated for the importance of such measures.

For that reason, NSO applauds the announcement of the U.S. Government, made in conjunction with Australia, Denmark, and Norway, and supported by Canada, France, the Netherlands and the U.K. These governments recognize, as does NSO, that responsible use of technologies such as NSO's "is essential for the well-being of our future generations." They also recognize, as does NSO, that authoritarian governments can abuse the technologies within and across their borders. As a result, the aligned governments have committed to working to establish a voluntary code of conduct for states to use export control tools to prevent the proliferation of technologies used to enable serious human rights abuses.

We are also pleased that these aligned governments have committed to work with industry and academia in these efforts.

As a company that has advocated for industry-standards to facilitate responsible use of technologies, we are highly supportive of this initiative. In furtherance of that effort, we would like to engage with your office to share the processes we have developed and the industry standards we have sought to embed, to help prevent serious human rights abuses within our sector and help address the serious issues identified by all the relevant parties.

**PAUL**  

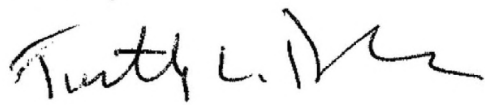
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**HASTINGS**

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We look forward to hearing back from you and working with you on this important work.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy L. Dickinson". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Timothy L. Dickinson  
for PAUL HASTINGS LLP

TLD:kr