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DwyerOmega - Export Compliance Policy

It is the policy of Dwyer Instruments, LLC and any of its affiliated companies (collectively referred to as "DwyerOmega") to fully comply with all applicable export control laws and regulations of the countries in which they operate. DwyerOmega affirms their commitment to conducting export activities in a lawful, ethical, and responsible manner, and to preventing unauthorized exports or transfers of products, technology, and services.

All employees, departments, divisions, subsidiaries, and affiliates of DwyerOmega are required to adhere to export control laws and regulations, including the Export Administration Regulations (EAR), and other relevant export control laws of the countries in which they operate. Under no circumstances shall transactions be conducted by, or on behalf of DwyerOmega or any of its holdings contrary to such laws and regulations.

DwyerOmega realizes the importance of compliance with export control laws in safeguarding national security and preventing the proliferation of sensitive technologies. Therefore, all employees, contractors, and affiliates involved in export-related activities must apply due diligence in abiding by export control guidelines, policies, and procedures as outlined in the respective company's Export Management and Compliance Program policy manual.

Formal training will be provided to all employees of DwyerOmega on a regular and ongoing basis to ensure understanding of their responsibilities under export control laws and regulations. Training will be tailored to fit specific departmental requirements and individual responsibilities.

Violations of export control laws and regulations may result in severe penalties, including fines, imprisonment, and loss of export privileges. DwyerOmega will view the failure of any employee to comply with their Export Management and Compliance Program as a serious violation of company policy and will take appropriate disciplinary action, up to and including termination of employment.

DwyerOmega's commitment to export control compliance extends to their relationships with suppliers, distributors, and other business partners. The Company will work with these entities to ensure that they also comply with applicable export control laws and regulations.



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Additionally, DwyerOmega will continue to encourage their partners, and their employees, to report any actions that may be in violation of the law or any of their other regulations and policies.

For their part, DwyerOmega and their affiliated companies have an obligation to investigate and address reported concerns. They do not retaliate against individuals for asking questions, raising concerns about compliance issues, or reporting possible misconduct.

Sound export control practices underscore DwyerOmega's commitment to ethical business behavior and compliance with applicable laws and regulations.

DwyerOmega

Global Trade Compliance Department

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