#### 2. EXPORT COMPLIANCE MANUAL.

Astro-Med, Inc. and its affiliates and subsidiaries are firmly committed to strict adherence to all U.S. export control laws and regulations including the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR) as well as other regulations relating to international dealings. In this regard, Astro-Med is committed to full compliance with all applicable export requirements pursuant to U.S. law including, but not limited to, those laws administered and enforced by the U.S. Department of Homeland Security, U.S. Department of State, the U.S. Department of Commerce, Bureau of Industry and Security, as well as the U.S. Department of Treasury, Office of Foreign Asset Control. Under no circumstances should the export of ITAR or EAR-controlled technical data, software, or commodities take place contrary to U.S. export control laws and regulations.

Administrative, civil, and criminal penalties exist for violations of export control laws and may be imposed against the Company and/or individual employees. Because of potential serious consequences associated with failing to comply with U.S. export control laws and regulations, all employees must be aware of their obligations for full compliance.

In accordance with the various U.S. laws and regulations, Astro-Med has established and implemented an export compliance policy and procedures to comply with the policy and U.S. export controls and regulations. Astro-Med's compliance policy and procedures are detailed in this Manual.

Astro-Med's Export Compliance Manual should be used not only as an educational tool, but also as a practical guide in the course of day-to-day order processing and any licensing management for all departments involved.

Compliance with the U.S. Export Laws is every employee's job, and each employee involved in international transactions should use this Manual to become educated with respect to his or her responsibilities. Deviation from compliance could jeopardize our Company's ability to export products. Failure to comply may result in disciplinary action by Astro-Med.

- This Export Compliance Manual will be maintained and distributed by the Export Compliance Manager (and is posted on the Company's Intranet site and available to all employees).
- The Manual is revised as necessary, due primarily to regulatory changes or changes in Astro-Med's export process.
- Human Resources will provide all new employees, at time of hire, with a copy of the "Regulatory Compliance Commitment" issued by Gregory Woods, CEO of Astro-Med, Inc.

# **Company Export Compliance Policy Procedure Manual**

**D** Siedentop

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