



To: All Employees and Contractors
From: Stephen E. Gill, C.E.O. and Chairman of the Board
Date: January 3, 2023
Subject: Export Compliance Policy Statement

The Departments of Commerce, State, and Treasury have a statutory and regulatory system for controlling and monitoring the movement of certain goods and technologies. Among other things, the system is designed to minimize the risk of diverting such items to locations which are not in the best interests of the United States.

It is of the utmost importance to The Gill Corporation that the laws and regulations governing the movement of these goods and technologies be followed. This will allow The Gill Corporation to maintain its good corporate citizenship status, avoid inadvertent violations, costly errors, and the possible disruption of business.

The regulations governing exports are:

- The Arms Export Control Act (AECA)
- The International Traffic in Arms Regulations (ITAR)
- The Export Administration Regulations (EAR)

The primary U.S. Government control body is the Directorate of Defense Trade Controls (DDTC) of the Department of State. The Export Administration Regulations fall under the purview of the Department of Commerce, Bureau of Industry and Security (BIS).

It is the policy of The Gill Corporation to fully comply with all laws and regulations, including requirements governing the export of its products, services, software and technical data. Each employee, therefore, must be dedicated to ensuring such compliance with government regulations. All sales, service, shipping, engineering, operations, accounting, quality and other personnel are required to be familiar with, and review regularly, The Gill Corporation Export Management and Compliance Program. Particular attention must be taken when releasing technical information to foreign nationals, electronic transmission of data and/or software, and the shipment of products outside the United States.

No transactions are to be conducted by or on behalf of The Gill Corporation contrary to U.S. export control laws and regulations, including the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR). Under no circumstances shall these laws and regulations be compromised for commercial gain. Neither sales nor shipments are to be made to any

individual or firm appearing on any of