

Neeco Industries, Inc. Global Trade Compliance

Neeco Industries, Inc. and its divisions (“Neeco”), is committed to full compliance with all laws of the United States, including those pertaining to export controls, economic sanctions and anti-boycott.

Neeco products are subject to the U.S. export controls and sanctions administered by the Bureau of Industry and Security under the U.S. Export Administration Regulations (EAR).

Prohibited Destinations

Prior written authorization from the U.S. government is required for direct or indirect exports and re-exports of Neeco products and technology to any country embargoed or restricted by the U.S. Currently, the embargoed countries are Cuba, Iran, North Korea, Sudan and Syria. For the most current information, please review the countries listed in country group E:1 Supplement 1 Part 740 of EAR, embargoes and other special controls Part 746 of EAR.

Denied Persons/Entities

Neeco products and technology may not be exported or re-exported to individuals or entities listed in the link below, which is automatically updated every day by the U.S government.

<https://www.export.gov/csl-search>

Anti-Boycott

U.S. anti-boycott laws prohibit Neeco from participating in restrictive trade practices or unsanctioned boycotts. Neeco must report any requests to participate in an unsanctioned boycott to the U.S. government.

ITAR Compliance

Although Neeco does not currently manufacture, sell or distribute any goods or services covered under the United States Munitions List, Neeco is registered with the State Department’s Directorate of Defense Trade Controls (DDTC), and Neeco understands and is in compliance with the International Traffic in Arms Regulations (ITAR) administered by the DDTC. Our ITAR registration number is renewed on an annual basis.

Obligations of Neeco’s Business Partners

All of Neeco’s third party business partners (i.e., customers, distributors, agents and other intermediaries) must not take any actions that would cause Neeco to be in violation of U.S. export controls and economic sanctions, including the following:

All such third parties must not sell, export, re-export, transmit, divert or otherwise transfer any Neeco products or technology directly or indirectly to any individual, business, non-U.S. government, country or other entity, including individuals or entities identified at <https://www.export.gov/csl-search> or for any end uses, if a U.S. person would be prohibited from taking such action by U.S. export controls or economic sanctions.

All such third parties associated with Neeco must not sell, export, re-export, transmit, divert or otherwise transfer any Neeco products or technology directly or indirectly without first receiving written confirmation from Neeco that all licenses or other approvals required for compliance with U.S. export controls or sanctions have been obtained.

If a third party becomes aware or suspects that any Neeco products or technology have been sold, exported, re-exported, transmitted, diverted or otherwise transferred to an end destination, end user or for an end use prohibited by U.S. export controls and economic sanctions, such third party must promptly notify Neeco.

Penalties

The penalties for failing to comply with U.S. export controls and economic sanctions can have serious consequences for Neeco, its third-party business partners, and the individuals involved. For example, Neeco or one of its third-party business partners, as applicable, could lose its authorization to export products and face severe fines and penalties. Individual employees who disregard U.S. export controls and economic sanctions (by act, conspiracy to act, or omission to act) risk personal fines from the government and, in the case of willful violations, imprisonment.

Contact

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