



## **Global Trade Compliance Policy**

It is OFS' policy to comply fully with the trade laws of all countries in which it does business, including those governing the export and import of OFS products, services, and technical data. This policy applies not only to OFS Fitel, LLC, but also to its subsidiaries, wherever located in the world.

As a U.S. company, OFS Fitel, LLC is subject to U.S. export control laws and regulations, which may in certain situations prohibit or limit the export or re-export of articles or technology, or the provision of services by it and its subsidiaries. OFS non-U.S. subsidiaries are also subject to U.S. export controls as well as the export laws of the countries in which they are located.

In accordance with applicable export regulations, OFS strictly prohibits the direct or indirect sale or shipment of goods, services, or technical data to or from any country subject to economic or trade sanctions (currently Belarus, Cuba, Iran, North Korea, Syria, Russia, the self-proclaimed Donetsk People's Republic, the self-proclaimed Luhansk People's Republic, the Crimea Region, and any occupied regions of Ukraine) unless otherwise authorized by law. Other countries and territories may have moderate to limited restrictions. Therefore, OFS Trade Compliance must review and approve new business into countries and territories.

OFS imports are subject to local and international customs law, including classification and valuation of imported goods, proper payment of duties on those goods, and nontariff restrictions on international trade.

All OFS employees involved in any aspect of global shipments of goods or provision of services or technical information, regardless of functional organization, share in the responsibility for global trade compliance. Each OFS employee should become familiar with this policy and OFS procedures implementing this policy and perform his or her duties accordingly.

Effective and compliant global trade processes assist OFS in meeting customers' expectations for cost-effective and timely delivery of products by minimizing cycle times, trade fees and customs duty issues. Sound processes ensure that accurate declarations are made to government authorities, reduce the risk of fines and/or penalties, and enhance our reputation as a global leader.

On the other hand, failure to comply with trade laws and regulations may result in the imposition of severe criminal and/or civil fines and penalties on individuals and OFS. Employees violating the law or OFS' policies and procedures may also be subject to disciplinary action, including dismissal from OFS.

For these reasons, no shipment of products, provision of services, or transfer of technology or technical information shall be made, if there are any questions of non-compliance. All goods, services, and technical information moved across national borders are required to be handled in accordance with the applicable laws and regulations of the exporting and importing countries.

More information about OFS global trade policies and procedures is available on Teams – Trade Compliance Manual.

For further information, or to seek advice on global import-export trade compliance matters, or anti-boycott matters, please contact OFS Sr. Manager, Global Trade Compliance Jose Abrantes ([jabrant@ofsoptics.com](mailto:jabrant@ofsoptics.com)).

If you need advice on other international trade compliance matters such as Foreign Corrupt Practices Act, or other anticorruption laws, please contact Bob Lake, Senior Vice President – Legal ([rdlake@ofsoptics.com](mailto:rdlake@ofsoptics.com)), Sheila Burks, Corporate Counsel ([sburks@ofsoptics.com](mailto:sburks@ofsoptics.com)), or Elizabeth Thomas, Corporate Counsel ([evthomas@ofsoptics.com](mailto:evthomas@ofsoptics.com)).

A handwritten signature in cursive script that reads "Holly Hulse".

Holly Hulse  
President and CEO