

**AEMC® INSTRUMENTS - EXPORT MANAGEMENT SYSTEM**

Backed by over 135 years of experience, Chauvin Arnoux®, Inc. d.b.a. AEMC® Instruments manufactures test and measurement instruments to international quality and safety standards. AEMC markets and sells products branded under the names of AEMC, Chauvin Arnoux, Metrix®, Pyro-Controle, Multimetrix® and others.

AEMC is committed to following guidelines regarding Sanctions Programs and Country Information as requested by the Export Administration Regulations administered by the Bureau of Industry and Security (BIS). U.S. export control laws follow U.S. origin products and are applicable in the full extent of the law. Any violations or concerns of possible violations of the above must be immediately reported to AEMC Senior Management for immediate attention and action. Personnel of AEMC, subsidiaries, distributors and export houses are required to abide by these guidelines:

- 1) **PRODUCT:** Electrical and Electronic testing and measuring instruments, (from current probes to insulation testers, to ground resistance testers to power quality monitoring). Although most of the Company's products are not controlled under the Commerce Control List, two are and the Company will ensure that any licensing requirements are met for such products when and if pertinent.
- 2) **BANNED COUNTRIES:** AEMC will not export finished products or parts to any country listed here as well as published lists and under Part 746 "Embargoes and Other Special Controls" of the Export Administration Regulations. Additional information on embargoes is found in the link below. Current comprehensive sanctions exist for **Cuba, North Korea, Sudan, Ukraine/Russia (Crimea) and Syria** along with any additional countries of concern. The AEMC Import/Export department will regularly check the status of the embargos and sanctions and inform all parties involved of any changes/updates. Orders from potential customers in any of these countries will not be accepted unless it is determined that the order does not fall within the sanction order, or a license is available from the Office of Foreign Assets Control (OFAC) and/or BIS. AEMC will use due diligence when accepting orders from subsidiaries, distributors, and export houses to determine if there may be a potential diversion concern and when necessary, request End User Certificates. AEMC strongly recommends all subsidiaries, distributors, and export houses to check the following website often to verify, observe and enforce ongoing restrictions: All questions regarding sanctions and embargos should be forwarded to the AEMC export department for clarification.  
[www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx](http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx)
  - a) There shall be no communications between AEMC Instruments and any foreign subsidiaries and/or distributors that could be considered "**facilitation**". This includes sales leads, requests for services, quotes, etc. that may be made directly or indirectly to AEMC Instruments from entities in sanctioned countries.
- 3) **END USE:** As per Part 742 and 744 of the Export Administrations Regulations, AEMC will not export its products or parts without a license to countries that fall under Anti-Terrorism Controls (**Cuba, Iran, North Korea, Sudan, Ukraine/Russia (Crimea) and Syria**), as mentioned in Part 742.1(d) of the EAR ([www.bis.doc.gov](http://www.bis.doc.gov)). AEMC products are not to be used for any non-proliferation or missile technology use. Subsidiaries and distributors should take all necessary steps to ensure that they know their customers' end use and when necessary, obtain an End User Certificate.
- 4) AEMC's subsidiaries and distributors should screen all parties that play a role in a transaction involving AEMC products and ensure proper record keeping as specified by the law. We recommend that subsidiaries and distributors alike sign up for automatic updates from BIS and the OFAC as new entities are added to these lists on a regular basis, including many Chinese, North Korean and Russian entities. A consolidated listing of all lists to check can be found at <https://www.trade.gov/consolidated-screening-list>, including but not limited to:
  - a) **END USER:** AEMC will not export their products to those individuals and organizations that are prohibited from receiving US exports.
  - b) **DENIED PERSONS LIST** — The AEMC Import/Export department performs routine screenings of the Denied Persons List to assure compliance with Part 764:  
<https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/denied-persons-list>

- c) SPECIALLY DESIGNATED NATIONALS AND BLOCKED PERSONS LIST – The AEMC Import/Export department performs routine screenings of the Specially Designated Nationals and Blocked Persons List as per this link: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>
  - d) ENTITY LIST – The AEMC Import/Export department performs routine screenings of the Entity List to assure compliance as per Part 744 Supplement 4. <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list> or <https://www.trade.gov/consolidated-screening-list>
- 5) AEMC will not import or export any product made in whole or in part with the use of any type of forced labor, including any products made in whole or in part in the XUAR region of China. The U.S. Department of Homeland Security has added several entities to the Specially Designated Nationals list for violations of the Uyghur Forced Labor Protection Act (UFLPA) and AEMC is prohibited from doing business with such entities.

Any concerns regarding potential matches to any of these lists should be addressed with AEMC directly.

Please refer all questions related to this EMS to the AEMC® Import/Export department.

Valerie Scheer  
Director of Operations  
*Reviews performed yearly or as needed*

Posting: Dover, NH  
International Subsidiaries  
Distributors Newsletter  
<https://www.aemc.com/support/legal-notice.cfm>

Scan QR codes below to the EMS resource links detailed in the referenced sections above:



#2) Banned Countries



#3) End Use



#4) Consolidated Screening List



#4 b) Denied Persons List



#4 c) Specially Designated Nationals  
and Blocked Persons List



OR



#4 d) Entity List as Per Part 744  
Supplemental 4.