

AEMC[®] INSTRUMENTS - EXPORT MANAGEMENT SYSTEM

Backed by over 100 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 concern 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). AEMC[®] Export Commodity Control Number (ECCN) is EAR99. No current products fall within the Commerce Control List and the licensing requirements of the same.
- 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** and additional countries may be added to this list from time to time. 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. AEMC[®] will use due diligence when accepting orders from subsidiaries, distributors and export houses to determine if there may be a potential diversion concern. 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
 - 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**). 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 customer's end use.
- 4) AEMC[®] urges subsidiaries and distributors to screen all parties involved in a transaction and ensure proper record keeping as specified by the law, and to sign up for automatic updates from BIS. A consolidated listing of all lists to check can be found at **www.export.gov/ecr/eg_main_023148.asp**, 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/the-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>**)

Please refer all questions to the AEMC[®] Import/Export department.

Valerie Scheer
Director of Operations
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Reviews performed yearly on March 28 unless international events require immediate action

Posting: Dover, NH
Foxborough, MA
International Subsidiaries
Distributors Newsletter