

Southworth International Group  
**Export Control Compliance Policy**  
Version 2.1  
January 12, 2021

**To:** All Directors, Officers and Employees of Southworth International Group and affiliated companies

**From:** John Morton, Chief Financial Officer, Southworth International Group, Inc.

**Re: Southworth International Group Export Control Compliance Policy**

All companies within the Southworth International Group (“Southworth”) are wholly owned subsidiaries of a U.S. corporate parent. Additionally, all non-U.S. domiciled companies (with the exception of Southworth de México) are wholly owned subsidiaries of a U.K. or Singapore corporate parent. These companies are therefore subject to U.S. and U.K. law regarding denied, restricted and sanctioned parties. Furthermore, all companies within Southworth International Group are subject to the laws of the countries and supranational organizations in which they are incorporated and do business, including the People’s Republic of China, Sweden, the United States, the United Kingdom, Singapore and the European Union.

It is the express policy of Southworth to comply with all export control and sanctions laws and regulations of the countries in which we do business, as well as with relevant American, British, Swedish, Singaporean and European Union laws and regulations. This policy applies to all directors, officers, employees and third-party contractors of all Southworth departments and subsidiaries. Southworth is committed to ensuring that all transactions undertaken by anyone operating on behalf of Southworth, including third parties, are in compliance with applicable export control and sanctions laws.

Violations of these laws and regulations may result in serious criminal and civil penalties, including fines, imprisonment, exclusion from the export licensing process, denial of export privileges and other sanctions which would impact the entire global business of Southworth. Non-compliance with this policy, these laws, and the procedures Southworth has established will not be tolerated. Employees who violate this policy will be subject to disciplinary action and/or termination.

This policy requires the following:

- All employees must comply with applicable export control and sanctions laws and regulations, as well as all relevant policies and procedures set forth by Southworth.
- All employees and contractors must fully understand how export control and sanctions laws apply to the work that they do, participate fully in all compliance training, report any potential compliance issues to the appropriate compliance personnel, maintain accurate records, and ask questions of the Southworth Chief Compliance Officer (who is the Southworth International Group CFO) or the Regional CFO for S-EMEA, S-APAC or S-AMS if they are uncertain as to what requirements, including American, British, Swedish, Singaporean and European Union restrictions, might apply.

- Southworth will not conduct business with any parties located, headquartered, registered, or operating in countries or regions that are sanctioned by the United States. This is the case whether or not U.S. origin items are involved and whether or not the goods or services are provided to or through these countries. This means that Southworth should not conduct any business with companies from these countries as the order party, bill-to party, ship-to party, consignee, end-user, or as an intermediary or reseller or in any other role in a proposed transaction.
- Southworth does not engage in any business with parties that are sanctioned by the United States or other governments of other countries in which we are domiciled, including but not limited to those that relate, directly or indirectly, to individuals and entities identified on (i) the List of Specially Designated Nationals maintained by OFAC (Office of Foreign Assets Control of the U.S. Department of Treasury) or (ii) the Denied Persons or Entity Lists maintained by BIS (Bureau of Industry and Security of U.S. Department of Commerce).
- Southworth employees, wherever they are located, are expected to follow company policies and procedures and to conduct appropriate due diligence on counter-parties in transactions. Where red flags, concerns or doubts exist, these should be escalated to the Southworth Chief Compliance Officer (who is the Southworth International Group CFO) or the Regional CFO for S-EMEA, S-APAC or S-AMS. Any exceptions to this policy must be approved in writing by the Southworth Chief Compliance Officer.

Southworth is counting on its employees and colleagues around the world to understand this policy and to exercise good judgment in evaluating potential risks. If you know of, or have any reason to suspect, any actual or attempted violations of this policy, immediately report the matter to the Southworth Chief Compliance Officer, the Regional CFO for S-EMEA, S-APAC or S-AMS or provide a report through Southworth's Ethics and Compliance Hotline. Southworth prohibits any threats or acts of retaliation against any personnel who in good faith seeks advice, raises a question or concern, makes a report, or assists Southworth in identifying or investigating actual or possible misconduct or violation of this policy or of any applicable export law. Such retaliatory conduct will not be tolerated, and is subject to disciplinary action up to and including immediate termination. Any personnel who believes that he or she has been subjected to any threats or acts of retaliation should report that belief immediately to the Southworth Chief Compliance Officer, the Regional CFO for S-EMEA, S-APAC or S-AMS or provide a report through Southworth's Ethics and Compliance Hotline.