

## Compliance Policy Statement

It is the policy of Cyphen to comply with international export control laws and regulations, including the requirements of Chinese and U.S. export controls. No Cyphen transaction that is contrary to this policy may be executed under any circumstance.

Without prior authorization from the US government, Cyphen's product may not be exported, re-exported, or sold, directly or indirectly, to:

1. Any embargoed or sanctioned country, or customers who intend to use the Cyphen product for the production of items whose ultimate end-user is an embargoed or sanctioned country;
2. Persons and entities included on the consolidated lists of prohibited and restricted parties, including but not limited to any person or entity listed on the Denied Persons list, the Entity List or the Unverified List published by the U.S. Department of Commerce's Bureau of Industry and Security as well as the Office of Foreign Asset Controls Specially Designated Nationals list (herein collectively referred to as the "RPL" list), unless authorized by relevant Government if legal requirements need to be fulfilled;
3. Any nuclear, chemical, or biological weapon or rocket, or missile or unmanned air vehicle (UAV), military intelligent end-use or end-user.
4. Other regulatorily restricted end use or end use per the product's ECCN.