DirectPCB ITAR/EAR Compliance Policy

The United States government has adopted two types of regulations to control exports of military-relevant items: the International Traffic in Arms Regulations (ITAR), a set of U.S. Department of State regulations that control the export of defense and military technology to safeguard national security; and the Export Administration Regulations (EAR), which cover items that may have use in defense articles such as munitions and vehicles.

ITAR and EAR exist to track military and defense sensitive material and to keep that material out of the hands of U.S. enemies. Noncompliance can result in heavy fines along with significant brand and reputation damage.

ITAR mandates that access to technical data related to defense and military technologies ***is restricted to US citizens only***, unless the proper export authorization or approval is obtained.

DirectPCB has overseas operations with non-U.S. citizen employees that have access to customer information meaning:

- **We are prohibited** from receiving or sharing ITAR technical data.
- We can only accept orders related to printed circuit boards controlled under U.S. Export Control Classification Number (ECCN) EAR99.
- **We cannot accept** ITAR controlled or higher controlled ECCNs.

DirectPCB cannot make the determination of what can be legally sent overseas for manufacture—only the customer or the customer's customer can determine a product's proper ECCN—therefore:

The customer is responsible as the exporter of record when they send their electronic files to sales@directpcb.com.

DirectPCB makes it very clear to the customer that we manufacture their product overseas—primarily China—by:

- stating our policy on the DirectPCB website.
- stating our policy on every DirectPCB employee e-mail signature line.
- stating our policy in the DirectPCB non-disclosure agreement (NDA) or adding that clause to a prospect's NDA when we first engage with a customer.
- stating the country of manufacture (origin) on the quote
- having customer addressing their purchase order to DirectPCB Hong Kong.
- stating the country of origin and the manufacturer's identifier on the commercial invoice.
- having the customer sign the annual DirectPCB ITAR/EAR acknowledgment form.

DirectPCB will conduct a quarterly Denied Party Screening on all overseas vendors used. Any vendor that presents itself on the list shall be disqualified from future use of manufacture.

IMPORTANT:

- ***The customer is directed to send all electronic data for request-for-quote (RFQ) or manufacture of product to sales@directpcb.com.***
- U.S. employees or sales representatives of DirectPCB ***shall not*** send customer electronic files from their work or private email addresses as they would be in violation of the above company policy. (U.S. employees or sales representative may be cc'd on those emails sent to sales@directpcb.com.)
- DirectPCB management shall be notified should any electronic data received that mentions specifications that could possibly indicate a possible export control violation by the customer. DirectPCB will get customer clarification in writing as to whether we proceed with the RFQ, the manufacture of product, or destroy any copies of the files received.