

## Emerson Regulatory Compliance Management Commitment Statement

Emerson Electric Co. is committed to fully comply with all applicable Regulatory Compliance laws, regulations, and requirements in all countries in which it or any of its subsidiaries, branch offices or other legal affiliates does authorized business. Regulatory Compliance within Emerson includes International Trade Compliance (import, export, supply chain security), Product Environmental Compliance, Anti-Corruption/Checkpoint Compliance, Conflict Minerals, Environmental and Information Governance/Data Privacy.

Violations of the laws and regulations in these compliance areas can lead to serious consequences, including significant fines and other costs, jail time for individual offenders, supply chain disruptions and reputational damage. Non-compliance can have a direct and significant negative impact on our business, suppliers, and customers.

All Emerson businesses and their locations, including engineering and sales sites, are expected to participate in an actively maintained Regulatory Compliance program which satisfies Emerson Regulatory Compliance standards and guidance. Each Emerson employee is required to fully comply with Emerson's Code of Business Ethics and all applicable policies and procedures pertaining to domestic and international laws and regulations. Under no circumstances will business activities of any kind (e.g., purchases, sales, engineering, projects, services) be made contrary to applicable laws and regulations.

Any employee with questions or concerns regarding Emerson's Regulatory Compliance program should contact their local Regulatory Compliance or Law Department personnel. Employees concerned about reporting potential violations also can contact the Emerson Ethics Hotline on a confidential basis by accessing the website (<http://www.emersoncompliance.com>) or by calling the applicable numbers:

- From USA/Canada locations: 800-893-2525 (free call)
- From European Union country locations: 001-770-776-5640
- From China locations: 400-6-612-074 (free call)
- From all other countries: 770-582-5243

Emerson employees may also access multilingual versions of the Emerson Code of Conduct at the following link: <https://www.emerson.com/en-us/investors/corporate-governance/business-ethics>



Lal Karsanbhai  
President & Chief Executive Officer



Ram R. Krishnan  
Executive Vice President & Chief Operating Officer





## National Instruments Management Policy on Export Compliance

It is the policy of National Instruments Corporation and its branches that all export and re-export sales or shipments of its products and technology will be made in accordance with all applicable global export control laws, including without limitation:

- United States export laws and regulations; and
- European Union and national export laws and regulations.
- Strategic Trade Act (STA) 2010

The United States export laws and regulations include, but are not limited to, the U.S. Commerce Department's Export Administration Regulations, U.S. State Department's International Traffic in Arms Regulations, U.S. Treasury Department's Foreign Assets Control Regulations and sanctions programs, Nuclear Regulatory Commission Regulations and the U.S. Energy Department's Assistance to Foreign Atomic Energy Activities Regulations. The European laws and regulations include, but are not limited to, the Council Regulation (EC) No. 428/2009 and the Hungarian Government Decree No. 50/2004 (111. 23).

Violations of these regulations could subject the company and individual personnel to significant penalties. These could include the loss of export privileges, fines, and imprisonment. A deliberate and willful violation of the company's policy, in the absence of mitigating circumstances, will be sufficient grounds for dismissal with cause of the employees involved.

Our Global Trade Compliance Department directs and counsels all parties involved in NI exports. Common activities that are subject to the global export regulations are as follows:

- Sending by any means finished products, raw materials, or other items from one country to end country destinations other than the country from which the item is sent (or, in the case of the European Union, from the European Union to a country outside the European Union)
- Transmission by any means of technology (such as engineering drawings for a finished product) from one country to end country destinations other than the country from which the technology is sent (or, in the case of the European Union, from the European Union to a country outside the European Union)
- Under United States export laws and regulations, transmission of technology to a "foreign national" within the U.S. or abroad
- Under United States export laws and regulations, providing a "Defense Service" to a "foreign person" within the U.S. or abroad.

If you have any questions or concerns about a technology transfer or export transaction, please contact Ni's Global Trade Compliance Department at [trade.compliance@ni.com](mailto:trade.compliance@ni.com) or (512) 683-6010.

**Ritu Favre**

Group President, National Instruments

**Sabrina Gilman**

Vice President, General Counsel

**Mark Jurovich**

Director, Global Trade Compliance



NI is now part of Emerson.



## **National Instruments Corporation**

### **Trade Compliance Policy**

#### **Purpose**

It is National Instruments' ("NI") policy to comply with all applicable import and export trade compliance regulations and laws as well as other mandatory trade regulations in the countries in which NI conducts business. NI is also committed to securing the global supply chain by participating in voluntary supply chain security programs, such as the Customs-Trade Partnership Against Terrorism ("C-TPAT") in the U.S. and the Authorized Economic Operators ("AEO") program in the European Union, China, India and other countries. Compliance failures can result in fines, criminal penalties, adverse publicity and suspension or revocation of the NI's import or export privileges. NI employees involved in import and export activities are responsible for ensuring compliance with applicable trade regulations and laws and applicable supply chain security policies and procedures.

#### **Scope**

This policy applies to NI, all NI subsidiaries, branch offices, affiliates, manufacturing facilities, and other NI entities, wherever located.

#### **Policy**

It is NI's intent to comply with both the letter and the spirit of the laws governing its imports and exports activities. This Policy sets forth NI's commitment to comply with applicable import and export control laws and regulations involving the import and export of products, services and technology, and internal policies to protect the global supply chain.

NI must submit accurate and complete import declarations to government authorities. NI will use reasonable care to ensure compliance with applicable import regulations regarding designated importer of record, import tariff classification, valuation, origin, duties and import tax payment, payment to the supplier, duty preference programs, temporary imports, bonded warehouse, duty drawback programs, and so forth impacting NI importation activities.

It is NI's policy to carefully observe the export control laws and regulations of all applicable jurisdictions impacting its exports and re-exports of products, services and/or technology. This includes sharing or releasing of export-controlled technology across national boundaries via such means as e-mail and other electronic communications. Since NI is a U.S.-based company, it must also comply with U.S. export regulations in every export transaction. NI will not engage in exports and re-exports of NI products, technology or services to countries that are embargoed by the U.S. government; sell to certain persons and entities or for specific end-uses; or release certain kinds of technology or software in violation of U.S. export regulations.





NI will obtain import or export licenses from government agencies (i.e., U.S. Bureau of Industry and Security, Hungarian Trade Licensing Authority, Malaysia Ministry of International Trade and Industry, etc.) as required for import and export transactions. Transactions with license requirements may include products, services and/or technology.

NI's commitment to securing the global supply chain is evidenced by our voluntary participation in supply chain security programs, such as the C-TPAT and AEO programs. These programs require NI and its employees to adopt and adhere to policies and procedures designed to protect the company's employees, property, and confidential information from potential threats, such as theft, drug trafficking, terrorism, human smuggling, and illegal contraband. All NI employees are responsible for taking the necessary precautions to safeguard goods entrusted in their care and to report any suspicious activity, unethical behavior, unauthorized personnel, or acts of fraud or theft to their management, the NI Legal Department, or NI's confidential ethics hotline.

It is NI's policy to comply with other trade regulations not falling under export or import control laws and regulations (e.g. financial sanctions) applicable to the given transaction or deal in which NI is, in any way, involved.

NI and its foreign subsidiaries are generally prohibited by U.S. law from complying with customer requests or foreign government policies supporting restrictive trade practices, including boycotts against specified countries such as Israel or against U.S. organizations or persons. NI employees should not agree to or participate in such boycotts, nor furnish information or execute documents supporting a prohibited boycott. Any NI employee that receives a potential boycott request must promptly report it to the Trade Compliance Department before making any response to the request. The Trade Compliance Department, in conjunction with the Tax Department, will ensure reporting of all such requests to the U.S. authorities.

Any violation of this policy may provide reasonable grounds for employee discipline, up to and including termination of employment. If any employee suspects that someone is violating the law, or this policy, it is his or her duty to report it to the NI Legal Department or to use NI's Ethics Hotline, to report the concern confidentially. NI will not tolerate any retaliation against an employee who honestly reports an issue or concern regarding compliance.

## **Responsibilities**

The Trade Compliance Department establishes policy and oversees the NI import and export trade compliance operations to ensure efficient flow of products and services across international borders and strict compliance to the trade regulations of the United States, the European Union, Malaysia and applicable laws governing our global trade activities. All NI employees involved in import and/or export activities are responsible to understand their roles to ensure compliance with applicable trade regulations and laws and requirements of



applicable supply chain security programs. The Legal Department is responsible for acting as the legal advisor to the Global Trade Compliance Department on legal matters impacting NI's import and export activities.

## **Training**

The Trade Compliance Department is responsible for ensuring that NI employees have sufficient training and resources to carry out their responsibilities under this policy.

## **Record Keeping**

All import and export records shall be retained according to the applicable trade compliance regulations and/or the NI designated retention period, whichever is greater. All records shall be readily accessible to the Trade Compliance Department, including addressing inquiries by government authorities.

- Import records include, but are not limited to, import declarations, commercial invoices, written communications with customs broker import agents or Customs officials, program reviews, and training records.
- Export records include, but are not limited to, transaction elements screenings, licenses, license requests, shipping documentation, written communication with the Government export authorities, program reviews, and training records.

## **Program Review**

The Trade Compliance Department is responsible for conducting periodic reviews of the NI Trade Compliance Program to ensure the company is complying with applicable trade regulations. Outside consultants may be retained to assist in conducting these reviews. If program deficiencies are found, appropriate action will be taken to correct those deficiencies.

The Trade Compliance Department shall review this policy and supporting materials periodically to ensure that they remain consistent with current applicable government laws, regulations, and policies.

## **Reporting**

Any indications of possible violations of trade compliance regulations and laws, this policy or the trade compliance program should be reported promptly to the NI Trade Compliance Department Director or the NI Legal Department.

## **References**

Questions with regard to this policy, the NI Trade Compliance program manuals and procedures, materials, or imports, exports, economic sanctions, boycotts, licensing requirements and other trade compliance matters, should be directed to the NI Trade Compliance Department at [trade.compliance@ni.com](mailto:trade.compliance@ni.com).



Additional resources on Trade Compliance can be found [here](#).

The Trade Compliance Department Director, reporting to the Vice President, General Counsel, is authorized and responsible to update and maintain this policy.

### Change History

Rev	Description of Change	Change Originator	Change Date
1	Initial release	Alexandra Kahn	February 2013
2	Added management letter	Alexandra Kahn	May 2018
3	Updated management letter	Alexandra Kahn	April 2019
4	Updated signatories of management letter	Alexandra Kahn	January 2020
5	Updated signatories of management letter	Mark Jurovich	June 2021
6	Added change history, updated reporting structure & minor formatting	Mark Jurovich	April 2023
7	Updated signatories of management letter & reporting structure in policy, added formatting for ownership change (Emerson)	Mark Jurovich	January 2024