

Advanced Integrated Circuit & Computing Headquarters Compliance Certification

Issued by Exeton Corp in connection with the sale, distribution, and onward transfer of advanced computing products.

1. Regulatory Background

This certification supports Exeton Corp's compliance with United States export control laws applicable to advanced integrated circuits, computers, and computing-related items, including but not limited to the Export Administration Regulations (EAR, 15 CFR Parts 730–774) and the advanced-computing controls announced by the U.S. Bureau of Industry and Security (BIS) in 88 Fed. Reg. 73458 (October 25, 2023), as amended, and the Framework for Artificial Intelligence Diffusion published January 13, 2025.

For purposes of this document, "Restricted IC Product" means any item that is (a) classified under ECCN 3A090, 4A090, or any related ECCN covering advanced integrated circuits, computers, electronic assemblies, or components that incorporate such advanced ICs, or (b) otherwise subject to export licensing requirements under EAR Part 744 or Country Group restrictions in Supplement No. 1 to EAR Part 740.

2. Restricted Destinations

Exeton Corp will not export, re-export, transfer (in-country), or facilitate the supply of Restricted IC Products to or within the following destinations without first obtaining the authorizations required by U.S. law. These destinations are derived from current BIS Country Group designations and embargo/sanctions programs:

Comprehensively Embargoed / Country Group E:1, E:2

- Cuba
- Iran
- North Korea (DPRK)
- Syria
- Russia
- Belarus
- Crimea / Donetsk / Luhansk regions of Ukraine

Arms-Embargoed / Country Group D:5 and Country Group D:1, D:3, D:4 (advanced-computing controls apply)

- China (PRC)
- Macau
- Venezuela
- Burma (Myanmar)
- Cambodia
- Central African Republic
- Democratic Republic of the Congo
- Eritrea
- Haiti
- Iraq
- Lebanon
- Libya
- Nicaragua
- Somalia
- South Sudan
- Sudan
- Zimbabwe

This list reflects current U.S. regulatory designations and is subject to change as BIS, OFAC, and related agencies update country-group assignments, sanctions programs, and embargo determinations. Exeton Corp screens each transaction against the live versions of these lists at the time of order acceptance.

3. Exeton Corp's Compliance Certification

Exeton Corp hereby certifies, in connection with its supply, distribution, and sale of advanced computing products, that:

- Exeton Corp maintains an active export-compliance program covering screening, training, recordkeeping, and senior-management oversight, consistent with the BIS Export Compliance Program guidance.
- Exeton Corp screens every counterparty, end-user, and shipment destination against the U.S. Department of Commerce Entity List, Denied Persons List, Unverified List, and the OFAC Specially Designated Nationals List, prior to acceptance of any order for Restricted IC Products.
- Exeton Corp will not knowingly export, re-export, transfer, or divert any Restricted IC Product to a destination, end-user, or end-use prohibited under U.S. export controls, including the prohibited end-uses set out in EAR §744.
- Exeton Corp does not engage in transactions intended to circumvent the controls established under 88 Fed. Reg. 73458 (October 25, 2023), the AI Diffusion Framework (January 13, 2025), or any successor regulation.
- Exeton Corp requires its downstream counterparties, distributors, and end-customers to provide compliance representations equivalent to those set out in this Certification before any Restricted IC Product is released.
- Exeton Corp promptly notifies its upstream suppliers of any material change to its corporate ownership, headquarters jurisdiction, or operating footprint that could affect this Certification.

4. Counterparty Representation

The undersigned (the "Company") represents the following to Exeton Corp as a condition of the supply of any Restricted IC Product, and agrees that Exeton Corp may rely on these representations:

COMPANY LEGAL NAME

COMPANY HEADQUARTERS COUNTRY

ENTITY TYPE / JURISDICTION OF FORMATION

TRADE / COMMERCIAL REGISTRATION No.

REGISTERED HEADQUARTERS ADDRESS (Street, City, Province/State, Country, Postal Code)

The Company attests that:

- ☐ The Company's headquarters and principal place of business are not located in any of the Restricted Destinations listed in Section 2.
- ☐ No person or entity owning, directly or indirectly, 10% or more of the Company is headquartered, organized, or ordinarily resident in any Restricted Destination.
- ☐ The Company is not listed on, nor owned 50% or more in the aggregate by parties listed on, the Entity List, Denied Persons List, Unverified List, OFAC SDN List, or any equivalent U.S. Government restricted-party list.

5. Continuing Obligations & Notification

The Company acknowledges that its representations under this Certification are continuing and apply to every transaction with Exeton Corp involving Restricted IC Products. The Company will promptly notify Exeton Corp in writing of any change in its ownership structure, headquarters jurisdiction, operating locations, or restricted-party status that could affect any representation made above. The Company will maintain records of each Restricted IC Product transaction for the period required by 15 CFR Part 762 and will make such records available to Exeton Corp and to U.S. Government authorities on lawful request.

6. Acknowledgements

- Future availability of any specific advanced IC, computer, or computing assembly may be affected by U.S. regulatory changes; Exeton Corp does not guarantee identical or compatible replacements for items rendered unavailable due to such changes.
- Information provided in this Certification will be used by Exeton Corp to comply with U.S. export-control and trade laws, and may be shared with upstream suppliers, OEMs, and U.S. Government authorities to that extent.
- The Company has the lawful authority to sign this Certification and to bind the Company to the representations and obligations herein.

7. Authorized Signatory

Company Legal Name

Print Name

Title / Designation

Email

Telephone

Signature

Date

ADDITIONAL INFORMATION / EXPLANATORY NOTES

(e.g. recent changes to HQ location, ownership disclosures, discrepancies in public materials)

Company Stamp

I certify that the foregoing is true and correct to the best of my knowledge and that I am duly authorized to sign this Certification on behalf of the Company.