

Export Control Compliance Policy

Scope

Brüel & Kjær is committed to complying with the spirit and the letter of the Danish Export Control legislation, the U.S. Export Control legislation when relevant and all applicable national regulations.

Over 95% of Brüel & Kjær sales are exports, shipped to countries all over the world. Some of our products can be used for weapons development or production, which in the wrong hands can contribute to decreased international security and threats against a peaceful world. It is therefore critical that we observe the export control legislation created to prevent this.

If export control regulations are violated, we as a company and possibly as private individuals are subject to administrative and/or criminal penalties. We may also be viewed by the press and the public as a company that cannot manage its activities properly, one that does not take legislation seriously – or worse yet, one that does business with terrorists. Compliance with export control regulations preserves both Brüel & Kjær's commercial success and our reputation.

Core Elements

To ensure compliance throughout Brüel & Kjær, a system of procedures has been put in place encompassing the following elements:

- Maintaining an updated survey of regulatory requirements affecting the B&K Export Control Policy.
- Establishing well-defined written responsibilities and procedures for all employees with export control duties, including management.
- Appointing an Export Control Manager (ECM) with overall responsibility for implementing B&K's export control policy.
- Delegating of responsibility for daily export control-related issues to an Export Control Specialist (ECS) and to relevant line managers, with the ECM retaining ultimate decision-making power in case of disagreement.
- Ensuring that all export control-related work is performed only by employees who have received formal training from the ECM/ECS and/or external parties, with refresher training at one-year intervals or more frequently as needed.
- Ensuring that all products are assigned an Export Control Classification Number (ECCN) and a B&K Export Control code (BKEC) approved by the ECM or, in his/her absence, the ECS, before they are released for sale.
- Making all non-proprietary procedures and related work guidelines easily accessible to all B&K employees.
- Conducting regular internal audits to ensure full compliance with the Export Control Policy and to provide input for the Management Review – and ensuring that proper corrective actions are taken in case of non-conformance.
- Archiving all relevant data and documents for each export transaction for the time period required by law.
- Drawing attention to export control issues to make compliance part of the B&K culture.

References

Spectris Group Manual, Sec. 6: Export Control Regulation Compliance

ECM1-10 Export Control Regulatory Requirements

ISO 9001, sec. 5.1. Management commitment

ISO 9001, sec. 7.2.1. Determination of requirements related to the product