



IMPORT & EXPORT CONTROLS COMPLIANCE POLICY

The United States and European Union including United Kingdom, like many other nations, have laws to control the import & export. NDCT, its employees and agents are subject to these laws & regulations.

It is NDCT's express policy to fully comply with all applicable import regulations and export controls, which are summarized in this Import & Export Controls Compliance Manual. Failure to comply could result in civil or criminal penalties, including but not limited to, fines, imprisonment, loss of export privileges, debarment, loss of tax benefits, revocation of previously approved licenses, seizure and forfeiture of goods. Such penalties may be imposed on NDCT, individuals employed by or otherwise affiliated with NDCT, or any combination thereof. Because of the fundamental importance of complying with all applicable import regulations and export controls, employees who knowingly violate such controls or this compliance policy will be subject to appropriate disciplinary action, up to and including possible discharge from employment.

Please read this document in its entirety and keep it on hand as a reference to address import regulations and export control compliance questions which you may have. You are encouraged to communicate any compliance questions or concerns to your manager or the Import & Export Controls Compliance Officer identified in this Manual. It is important to remember that you have an obligation to report any actions you believe are violations of the law, this Import & Export Controls Compliance Manual, or any of the company's other regulations and policies. For its part, the Company has an obligation to investigate and address reported concerns. The Company does not retaliate against individuals for asking questions, raising concerns about compliance issues, or reporting possible misconduct.

Sound import & export control practices underscore our commitment to ethical business behavior and compliance with laws and regulations of countries we do business in. Thank you for your shared commitment to NDCT's compliance efforts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mahesh Havildar', is written over a horizontal line.

Mahesh Havildar
Vice President, Operations & Service