

DATE: March 30, 2026
TO: All Employees & Contractors
FROM: Mike Hill, CEO
SUBJECT: Export Policy Statement

Vybond Group, Inc. (“Vybond”) is committed to full compliance with all applicable U.S. and international trade laws and regulations, including but not limited to the Export Control Reform Act of 2018, 50 U.S.C. 4801-4852; the Export Administration Regulations (“EAR”), 15 C.F.R. parts 730-774; the International Traffic in Arms Regulations (“ITAR”), 22 C.F.R. parts 120-130; the Arms Export Control Act, 22 U.S.C. § 2778; and the International Emergency Economic Powers Act, 50 U.S.C. §§ 1701-1706 and related sanctions programs. U.S. export control laws are administered by various federal agencies, primarily the Departments of Commerce, State, and Treasury, and aim to protect the national security and foreign policy interests for the United States. Such laws and regulations include:

- Restrictions on the export, reexport, or transfer within a third country of certain items (commodities, software, and technology/technical data);
- Restrictions on releases or transmissions of controlled technology (including design information) to certain non-U.S. persons wherever located; and
- Economic sanctions and embargoes against certain countries, terrorist/terrorism-sponsoring organizations, entities involved in the proliferation of weapons of mass destruction, international narcotics traffickers and “Specially Designated Nationals.”

Vybond’s commitment to compliance with these laws and regulations applies to all Vybond business activities and is an integral part of how we conduct business globally. It is Vybond policy that all employees, officers, directors, and contractors acting on Vybond’s behalf comply with all applicable export control and trade compliance laws. Under no circumstances may any export, re-export, transfer, or transaction be conducted in violation of these requirements or without required authorization.

Employees and contractors outside the United States must not re-export, transfer, or otherwise make available any Vybond products, technology, technical data, or software without appropriate review and authorization. This includes foreign-produced items that may be subject to U.S. export controls due to U.S. content, technology, or origin.

Vybond will not engage in any activity that supports prohibited end uses or end users, including activities related to nuclear proliferation, missile technology, or chemical or biological weapons, or transactions involving sanctioned or restricted countries, entities, or individuals.

Failure to comply with these requirements expose Vybond and individuals to significant criminal and/or civil fines and penalties, including jail time and monetary penalties, loss of export privileges, and reputational damage. Any employee or contractor who violates this policy may be

subject to disciplinary action up to and including termination of employment or contract, consistent with applicable law.

I expect every employee and contractor to take this responsibility seriously and to raise questions or concerns before proceeding with any transaction that may involve export controls, sanctions, or other trade compliance risks. When in doubt, stop and seek guidance.

Questions or concerns regarding trade compliance, the legitimacy of a transaction, or potential violations should be directed to:

Hillary Cole

Sr Legal & Compliance Manager
(508) 918-1744
hillarycole@vybond.com

Slawomir Kwasnicki

Trade Compliance Specialist
(401)396-0236
slawomirkwasnicki@vybond.com

This Global Trade and Export Compliance Commitment Statement will be reviewed and reissued periodically, and updated as necessary to reflect changes in business operations, management, or applicable laws and regulations.

The Legal & Compliance function is responsible for implementing, communicating, and maintaining Vybond's trade compliance program, including dissemination of this Statement through policies, training, and internal communications. Vybond leadership is committed to providing appropriate resources, training, and oversight to support effective global trade compliance and expects managers to reinforce these expectations within their teams.

Sincerely,

A handwritten signature in black ink that reads "Michael Hill".

Michael Hill
CEO, Vybond