



Export Control Policy (Internal)

Delta Electronics EMEA

Version: 2026/01

1. Purpose and Commitment

Delta Electronics (hereafter "Delta") is committed to full compliance with all applicable **national and international export control and sanctions laws**. This Internal Export Control Policy establishes mandatory requirements governing all Delta employees and business activities within EMEA.

Export compliance is a core element of Delta's **risk management, legal compliance, and corporate responsibility**.

2. Scope of Application

This policy applies to:

- All Delta directors, officers, managers, and employees
- All Delta entities and business activities within EMEA
- All exports, re-exports, in-country transfers, and **intangible transfers of technology**

3. Regulatory Framework

Delta is subject to:

- EU export control and sanctions regulations
- U.S. EAR and applicable re-export controls
- National export control and sanctions laws

Violations may result in **civil and criminal penalties**, loss of export privileges, and reputational damage.

4. Prohibited Activities

Employees must not, directly or indirectly:

- Support prohibited weapons or missile programs
- Engage in transactions involving sanctioned parties or destinations without authorization
- Circumvent export control or sanctions requirements

Any sanctions match or red flag **must be stopped and escalated immediately**.

5. Screening and Due Diligence

Employees must ensure:

- Sanctions and party screening is completed
- Products, software, and technology are properly classified
- End-use and end-user are verified and legitimate

Uncertainty must be escalated before shipment or disclosure.



6. Employee Responsibilities

Each employee is responsible to:

- Understand export control requirements relevant to their role
- Comply with this policy and Delta procedures
- Recognize that exports may occur without physical shipment
- Report suspected or actual violations immediately

7. Escalation and Reporting

All export control concerns must be escalated to:

- Supply Chain / Export Compliance
- Delta Legal, where applicable

No transaction may proceed until cleared.

8. Enforcement and Discipline

Violations may result in:

- Disciplinary action, including termination
- Personal and corporate legal liability

Delta will cooperate fully with authorities.

9. Governance

This policy is effective upon publication and replaces prior internal export control policies. Updates may be issued to reflect regulatory or business changes.

10. Acknowledgement

Compliance with this policy is a condition of employment. All employees are required to read, understand, and comply with this policy.

March 2026

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