

MEMORANDUM

TO: All Representatives

FROM: James J. McIntyre, President & CEO

SUBJECT: Export Policy Statement

To continue to expand our global presence in the marketplace, it becomes increasingly important to ensure any parties acting on behalf of the Greenheck Group follow the export regulations that govern our products.

It is the Greenheck Group policy that all exports and re-exports are in accordance with U.S. export regulations. It is the Greenheck Group policy that under no circumstances will we allow dealings with individuals on any U.S. Restricted Parties lists or to firms owned or associated with those parties. Further complying with U.S. export regulations, it is our intent that no transactions will be allowed when the end use supports proliferation of missile, nuclear, chemical, or biological weapons. Representatives must also comply with U.S. sanctions, which prohibit or restrict the export or re-export of U.S. products to certain countries or regimes.

Additionally, our representatives play a critical role in providing us with true and accurate information on the end users, the end use, and the end country destination of our product.

Adherence with these regulations is critical for all parties involved to maintain the privilege to export. In addition to loss of export privileges, failure to comply may also lead to fines and penalties.

I ask each of you to take this matter very seriously and support the Greenheck Group in this effort. Any questions concerning a suspect violation or legitimacy of a transaction should contact: Marco Espinoza, Assistant Legal Counsel, 715-355-2306.

Sincerely,

James J. McIntyre
President & CEO

All representatives are required to read and sign the following verification statement.

I, ________, hereby acknowledge that I received the Greenheck Group export policy dated 08/26/2014 and signed by James J. McIntyre. I have read such policy statement and will support the Greenheck Group compliance efforts.

Representative Signature

Office #

Date