

PRIME TECHNOLOGY CORP.
EXPORT MANAGEMENT AND COMPLIANCE PROGRAM

Export Compliance Policy Statement

The United States has a statutory and regulatory system for controlling and monitoring the movement of certain goods, information and technologies. Among other things, the system is designed to minimize the risk of diverting such items to locations which are not in the best interests of the United States.

It is of the utmost importance to Prime Technology Corp. that the laws and regulations governing the movement of these goods, information and technologies be followed. This will allow Prime Technology Corp. to maintain its good corporate citizenship status, avoid inadvertent violations, costly errors, and the possible disruption of business.

It is the policy of Prime Technology Corp. to fully comply with all laws and regulations governing the export of its products, services, software and technical data. Each employee, therefore, must be dedicated to ensuring such compliance with government regulations. All sales, service, shipping, engineering, accounting and other personnel are required to be familiar with, and review regularly, the Prime Technology Corp. Export Management and Compliance Program. In addition, all contractors and consultants are required to be familiar with, and review, the Prime Technology Corp. Export Management and Compliance Program. Particular attention must be taken when releasing technical information to foreign nationals, electronic transmission of data and/or software, and the shipment of products outside the United States.

No transactions are to be conducted by or on behalf of Prime Technology Corp. contrary to U.S. export control laws and regulations, including the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR). Under no circumstances shall these laws and regulations be compromised for commercial gain. Neither sales nor shipments are to be made to any individual or firm appearing on any of the Denied Parties Lists, or to any firms owned by or associated with the individuals or firms therein listed.

Some of Prime Technology Corp. goods, information and technologies can be adapted or used for military purposes. Other goods, information and technologies have both civilian and military applications. Many of these items are governed by U.S. export regulations. These regulations are in place to prevent the distribution of goods, information and technologies that can compromise national security. In some cases, even the unauthorized transfer of low-level goods, information or technology can potentially jeopardize national security or further the development of weapons of mass destruction.

The regulations are very precise, and compliance with them is mandatory, not voluntary. No employee, consultant or contractor has the authority to act contrary to this program, nor direct, authorize, or condone violations of the program by any other employee, consultant or contractor.

Export compliance is a daily exercise. Noncompliance is very costly. All Prime Technology Corp. employees, consultants and contractors are required to comply with the policies and procedures outlined in this Export Management and Compliance Program. Any employee, consultant or contractor who has knowledge of facts or incidents, which he or she believes may violate U.S. export regulations or this program, whether intentional or accidental, is required to report the matter promptly to the Export Compliance Officer.

Violations of U.S. export laws can subject Prime Technology Corp. and its employees, consultants and contractors individually to severe penalties, including fines, denial of export privileges, and even imprisonment. Any employee, consultant or contractor who violates such laws, or who knowingly permits a subordinate to violate such laws, will be subject to appropriate disciplinary action, up to and including termination.

It is important to recognize that terms like "classification" and "classified," when used in conjunction with this program, **do not** refer to military designations for Classified, Secret or Top Secret work. Instead, "classification" in this program is used to describe the process by which Prime Technology Corp. identifies the status of work being performed, relative to U.S. export regulations. Separate controls and precautions should be taken when handling Classified, Secret or Top Secret work.

All questions regarding export compliance and how it impacts your job, as well as any question concerning the legitimacy of any transaction, violation, or potential violation should be immediately referred to the Export Compliance Officer.

I ask each of you to take this matter very seriously and support me in this effort.

Export Compliance Officer
Prime Technology Corp.