



## **Trade Compliance Statement**

As a global company, dōTERRA is committed to complying with all applicable trade laws and regulations. We believe that adherence to these laws is essential to our success as a responsible business and a trustworthy business partner.

We strive to maintain the highest standards of integrity and ethical behavior in all of our business dealings. dōTERRA has established a strict control system and Internal Compliance Program (“ICP”) to ensure our products and services are provided in compliance with application laws.

Our commitment to trade compliance includes:

1. Compliance with all applicable laws and regulations governing international trade, including but not limited to import and export controls, sanctions, and anti-corruption laws.
2. A global trade compliance structure that oversees and implements dōTERRA’s trade compliance policies and procedures.
3. Conducting due diligence on and screening of our Wellness Advocates, Wholesale Customers, partners, including suppliers, and agents, to ensure compliance with applicable trade laws and regulations.
4. Providing training and resources to our employees and partners to promote awareness and understanding of trade compliance requirements.
5. Maintaining accurate and complete records of all transactions and activities related to international trade, as required by law.
6. Conducting internal risk assessments and self-auditing of compliance with trade laws.
7. Promptly reporting and escalating potential violations, if any, of trade laws or regulations internally and where appropriate to governmental authorities and taking appropriate corrective actions.

We expect all dōTERRA employees, Wellness Advocates, and other partners to uphold these standards of trade compliance and to act with integrity and ethical behavior in all of their business dealings. We recognize that trade compliance is a shared responsibility, and we are committed to working collaboratively with our partners to ensure that we all comply with applicable laws and regulations.

### **Export Regulations**

Our products may be subject to certain export control laws. The vast majority of our products fall either outside of Export Administrative Regulations (“EAR”), or if they are subject to EAR, they are excused under EAR99. Non-the-less certain restrictions may still apply depending on destination countries.

### **Prohibited End Users**

In accordance with applicable export control and economic sanctions laws and regulations as well as dōTERRA corporate policies, all dōTERRA products and services are prohibited for export/reexport/transfer to or access by the following:

- Any person, company, or other resident of Cuba, Iran, North Korea, Syria, and the Crimea region, Ukraine's Donbas, Luhansk, and other Russian controlled areas of Ukraine. This list may change without notice at the sole discretion of dōTERRA.
- Re-export to the above countries is prohibited; you may not purchase our products if you “know or have reason to know” it would be contrary to applicable laws or regulations.
- Entities or persons listed on including but not limited to the UN Consolidated List, U.S. Government’s Entity List, Denied Party/Person List, Specially Designated Nationals (SDNs) list, EU Consolidated Sanctions List, etc.

Due to our commitment to adhere to trade restrictions, dōTERRA reserves the right to refuse to sell its products or provide its services to anyone at our sole discretion or to cancel an order or account if there is any suspected violation of or intent to violate applicable laws.