



EXPORT COMPLIANCE POLICY STATEMENT

MEDRAD is a global company with a global distribution network. Clinicians worldwide rely on us to provide outstanding performance every time our products are used. Our products help physicians diagnose patients more accurately and, ultimately, deliver quality patient care. As a global company developing, manufacturing, marketing, servicing and selling products that are critical to the healthcare sector, our success at meeting these expectations depends on the ability to ship our products and deliver our services around the world in an efficient and timely manner, while always honoring our Code of Business Conduct and complying with U.S. export control laws and regulations. To maintain compliance with such laws in the most efficient and cost-effective manner, MEDRAD has developed the export compliance program described in its Export Compliance Manual.

The U.S. government strictly regulates all exports of U.S. products, technology and software, the movements of U.S.-origin commodities and technologies between non-U.S. countries (called a "**re-export**"), as well as certain activities of U.S. persons wherever located, through the use of various regulatory requirements commonly called "**export controls**." Under U.S. law, exporting is a "privilege" and not a "right," which means that MEDRAD must remain in compliance with the U.S. export control laws to minimize the risk of losing its export privileges. Export controls are in place to further U.S. national security and foreign (including non-proliferation of weapons of mass destruction and their means of delivery) policies that apply to MEDRAD, its employees, contractors and in some cases even its non-U.S. subsidiaries and their employees.



More specifically, our Export Compliance Manual is intended to ensure full compliance by MEDRAD with the United States Export Administration Act ("**EAA**") and Export Administration Regulations ("**EAR**"), including when in force pursuant to the International Emergency Economic Powers Act ("**IEEPA**"), the U.S. Trading with the Enemy Act ("**TWEA**"), IEEPA and the embargo program regulations in § 31 C.F.R. Parts 500 et seq. of the United States Department of Treasury's Office of Foreign Assets Control ("**OFAC**"), the U.S. Arms Export Control Act ("**AECA**") and International Traffic in Arms Regulations ("**ITAR**"). MEDRAD understands the importance of an appropriate export compliance infrastructure in support of its Export Compliance Manual and is committed to ensuring that its employees receive the necessary training on applicable laws and policies to support export compliance.

Failure by employees to comply with the U.S. Export Control Laws and Regulations can have significant adverse consequences for MEDRAD and the individuals involved in such non-compliance, including delayed or detained shipments, civil and criminal monetary fines and penalties, including prison, and loss of corporate export privileges. Export control law and regulation violations are "strict liability" offenses, meaning that there can be penalties imposed without regard to the intent, knowledge or the degree of care of MEDRAD or the involved employees in attempting to comply with those laws and regulations. Of course, if there is an intent to engage in or knowledge of violations of U.S. export control laws or regulations, or a lack of care in attempting to comply with those laws and regulations, then greater penalties can be imposed on MEDRAD. All MEDRAD employees are required therefore to comply with the policies and procedures outlined the Export Compliance Manual. Failure by any employee to adhere strictly to such constitutes grounds for corrective action, up to and including termination of employment. Any employee who has knowledge of facts or incidents, which he or she



believes may violate this policy or the U.S. Export Control Laws and Regulations, whether intentional or accidental, is required to report the matter promptly to the Export-Import Compliance Administrator and the Chief Compliance Officer.

Questions concerning U.S. Export Control Laws and Regulations, your individual export control responsibilities, or any other export related matters should be directed to the Export-Import Compliance Administrator. This Statement has been approved and adopted by MEDRAD's Compliance and Ethics Advisory Board.

A handwritten signature in black ink, which appears to read "John P. Friel". The signature is fluid and cursive.

John P. Friel
President & CEO

September 19, 2008