

April 5, 2019

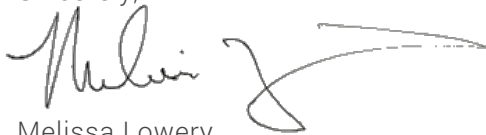
**REALWEAR, INC. SELF-CLASSIFICATION OF HMT-1 AND HMT-1Z1
 UNDER U.S. EXPORT ADMINISTRATION REGULATIONS (EAR)**

Product Name/Model	HMT-1 (Model T1100G), HMT-1Z1 (Model T1100S)
Manufacturer	RealWear, Inc.
Review Date	April 5, 2019
Reviewer Name	Dr. Christopher Parkinson, CTO of RealWear, Inc (technical) Jonathan Epstein, Holland & Knight LLP (regulatory)
Summary	The commodities ("Products") are self-classified under Export Control Classification Number (ECCN) 5A992.c as "Mass Market" encryption commodities under 15 C.F.R. § 740.17(b)(1) of the U.S. Export Administration Regulations ("EAR"). The Products are eligible for export to most countries and most end-users without a license, and no prior U.S. Government review (CCATS #) is required.

Export of Product from U.S.:	<p>These products are self-classified under ECCN 5A992.c. Under current regulations, the Product can generally be exported from the U.S. to most countries (other than embargoed countries including Cuba, Iran, Syria, Sudan, North Korea, and the Crimea region of Ukraine), provided that the end-user or end-use is not prohibited under the EAR without a license "NLR" (no license required).</p> <p>Invoices or other export control documentation for exports from the United States should contain a Destination Control Statement per 15 C.F.R. § 758.6 as follows:</p> <p><i>"These items are controlled by the U.S. Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated</i></p>
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	<i>into other items, without first obtaining approval from the U.S. government or as otherwise authorized by U.S. law and regulations.”</i>
EU Classification	The Products are not controlled on the European Union Dual Use List. Council Regulation 428/2009 as amended controls certain dual use goods including certain commercial products utilizing encryption. However, in 2017, the EU “decontrolled” mass market encryption devices and software under Cryptography Note 3 to Category 5, Part 2 (“Information Security”) under the same substantive criteria as under the EAR. (The UK Government published guidance on this decontrol in April 2018 that goes into considerable depth on this subject. https://www.gov.uk/government/publications/notice-to-exporters-201807-guidance-on-the-cryptography-note/notice-to-exporters-201807-guidance-on-the-cryptography-note)
Contact:	Melissa Lowery, RealWear Corporate Counsel legal@realwear.com

Sincerely,



Melissa Lowery
Corporate Counsel