



Aspen Technology, Inc.
Statement of Policy on Export Compliance
February 7, 2022

This Statement of Policy on Export Compliance will be reissued periodically as appropriate. The Export Compliance Manager is responsible for disseminating this Statement throughout the company, including through updates to the company's Export Compliance Program Manual, incorporation into training and presentations, and publication on the AspenTech Intranet and public website, as applicable.

Since the company's founding in 1981, Aspen Technology, Inc. ("AspenTech") has provided software solutions that help the world's best companies increase operational efficiencies to improve environmental impact. Our mission is to digitally transform the industries we serve by optimizing their assets to run safer, greener, longer and faster.

In order to execute our mission, we require the continued dedication of the AspenTech Board of Directors, executive management, and all our employees, to the utmost standards of ethics and integrity as set forth in the AspenTech Code of Business Conduct and Ethics. Our Code is intended to deter wrongdoing and to promote the conduct of all AspenTech business in accordance with high standards of integrity and in compliance with all applicable laws and regulations.

Our uncompromising commitment to integrity further requires compliance with all applicable export controls set forth in the U.S. Export Administration Act and related Export Administration Regulations. This commitment extends to promoting strict compliance on an ongoing basis with all practices and procedures established by AspenTech to ensure compliance with applicable export requirements.

All AspenTech employees, channel partners and subcontractors must comply with U.S. export policies and regulations, and under no circumstances may any goods or services be provided contrary to U.S. export regulations by any individual operating on behalf of AspenTech.

Employees outside the U.S. may not re-export any commodity, technology, or software unless appropriate authorization has been obtained, and this includes foreign-produced items that are the direct product of U.S. technology and software and are subject to export controls under the U.S. Export Administration Act.



No activities will be undertaken that are in violation of the U.S. policies which seek to control nuclear proliferation, missile technology, and chemical and biological weapons.

Failure to comply with these regulations may result in the imposition of criminal and/or civil fines and penalties, including jail time and monetary penalties, and employees will be subject to disciplinary action and/or termination.

If you have any questions concerning the legitimacy of a transaction or a potential violation, please seek advice from the AspenTech Export Compliance Manager named below.

Susan Cutright
Vice President and Associate General Counsel
781.221.5238
susan.cutright@aspentech.com

I ask each AspenTech employee to take export compliance very seriously and to support AspenTech personnel who are responsible for oversight and execution of our compliance processes and procedures. Thank you for joining me in supporting AspenTech's commitment to export compliance and to the highest standards of integrity in general in pursuit of our mission to make the world's best companies even better.

A handwritten signature in black ink, appearing to read "Antonio J. Pietri", with a large, stylized initial "A" and a long, sweeping underline.

Antonio J. Pietri
President and Chief Executive Officer