



Aspen Technology, Inc.

Global Trade Compliance Statement

Last updated: August 2026

AspenTech is committed to responsible global business and compliance with applicable trade laws that govern our software, technology, services, and digital solutions.

How Trade Compliance Applies to Our Business

As a global industrial software company, AspenTech serves customers across energy, chemicals, engineering, manufacturing, and other asset-intensive industries. Our business includes software licensing, cloud and SaaS solutions, digital platforms, implementation services, technical support, software updates, and access to technical information.

Because these activities may involve cross-border access to software, technology, data, or services—including certain releases of controlled technology to non-U.S. persons—trade compliance is an integral part of our operating model.

Applicable Trade Laws

AspenTech complies with applicable laws governing the export, reexport, transfer, release, sale, licensing, and provision of software, technology, technical information, products, and services, including U.S. export controls administered by the Bureau of Industry and Security (“BIS”) and economic sanctions administered by the Office of Foreign Assets Control (“OFAC”) for U.S.-subject activities.

AspenTech also follows applicable trade requirements in the countries and regions where we operate. These requirements may depend on the destination, end user, end use, ownership, restricted-party status, and other regulatory considerations.

Product classification helps AspenTech determine how trade laws apply to our software, technology, technical information, products, and services and supports review of potential licensing obligations or restrictions.

Our Compliance Approach

Our compliance approach addresses the evolving global trade environment, including sanctions enforcement, restricted-party exposure, ownership and control, diversion risk, deemed exports and reexports, end-use and end-user due diligence, sensitive end-use concerns, encryption, artificial intelligence, cloud access, remote technical support, and emerging technology controls.

- Product and technology classification



- Licensing and authorization reviews
- Restricted-party and sanctions screening
- End-use, end-user, and third-party diligence
- Recordkeeping, monitoring, and escalation of potential concerns

Partner Expectations

AspenTech does not knowingly engage in transactions prohibited by applicable trade laws or sanctions programs. We expect our employees, representatives, channel partners, distributors, resellers, customers, suppliers, and other business partners to support lawful and ethical business practices.

No employee or third party acting on AspenTech's behalf may bypass, attempt to bypass, divert, or facilitate diversion around trade controls, including through unauthorized software access, redirected downloads, alternative routing, unsupported country changes, unapproved intermediaries, or other arrangements intended to avoid screening, licensing, sanctions, or technology-transfer requirements.

AspenTech's Global Trade Compliance team works with business, legal, sales, product, supply chain, and operational teams to evaluate potential trade compliance risks before transactions proceed. When a concern or red flag is identified, it must be reviewed and resolved before the relevant activity continues.

AspenTech retains compliance records in accordance with applicable legal and company requirements and continues to enhance its controls as laws, sanctions, technologies, and global business risks evolve.

Questions and Compliance Support

For questions about AspenTech's trade compliance commitments, contact:

Global Trade Compliance Team

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Approved by: Jennifer Itzkoff, General Counsel