UK Tax Strategy Statement Regarding Commercial Activities– Schedule 19, Finance Act 2016

This document has been approved by the respective Board of Directors for all UK entities listed in Appendix A for publication in accordance of our statutory obligation under Para 16(2), Schedule 19, Finance Act 2016.

Tax Risk Management and Governance Arrangements

The UK entities' tax strategy and tax risks is the responsibility of the Vice President (VP) & Treasurer. Such strategy and risks are reviewed with the VP & Treasurer and the Chief Financial Officer ("CFO") annually. Day to day responsibility is delegated to the Senior Tax Director to manage tax risk through the tax department and through the operational accounting functions of the UK business. The Senior Tax Director has regular communications with the VP & Treasurer in all significant tax matters.

The tax department identifies and manages UK tax risks using its knowledge of the UK entities' operations and UK tax legislation. It does this through:

- Regular communication with finance staff within the UK business to keep informed of any significant business changes;
- Formal and informal reporting process to gather both qualitative and quantitative information from the businesses;
- Regular communication with VP & Treasurer and local controller or the UK entities' senior management executives about intra-group finance;
- Involvement in all acquisitions including review of financial and tax due diligence reports into the target's business; and
- Monitoring proposed changes in UK tax law to identify potential impact for the UK entities.
- Adhering to the Curtiss-Wrights' Code of Conduct.

The Group tax strategy focuses on four aspects.

I. Commitment to Compliance

Our commitment is to comply with tax law and practice in each country in which we operate. Compliance to us means paying the lawful and proper amount of tax within the timeframe allowed under local tax law and relevant tax treaties. We apply tax incentives and exemptions and ensure that those are suitable and appropriate for the Curtiss-Wright business according to UK tax law.

Our strategy for compliance is managed through the establishment of people, processes and systems deployed across our businesses in conjunction with the efforts of the tax department and various local third party tax service providers.

II. Attitude Toward Tax Planning

Our goal in tax planning is to balance our responsibilities for controlling the UK entities' tax costs with our responsibilities to paying tax within the laws of the countries within which we operate. Any tax planning strategies undertaken are done so in application of the OECD standard, transfer pricing and the arm's length principle, as well as are:

a. Aligned with the genuine commercial and economic substance of the business;
b. Aligned with a low tolerance for tax risk;
c. Mindful of potential reputational impact; and
d. Considered with a view to long term benefits.

Processes for evaluating tax planning opportunities include a thorough review by the tax department as well as guidance from local third party tax experts as required.

III. Tolerance for Tax Risk

The UK entities have not set formal quantitative risk limits in relation to the financial tax risk that they assume. Instead, tax risk provisions and tax risk assessment tools are periodically reviewed by the tax department based on quantitative and qualitative information gathered from the business through both formal and informal reporting processes. The assessment of risk is projected based on known or expected risks and settlements to allow an informed assessment of tax risk, how that risk is managed over time and any actions that might need to be taken in the context of known or expected internal or external developments. This review may result in decisions in relation to the type and level of tax planning that is to be undertaken, but as noted above, is not governed by formal limits but instead an overall goal to ensure we operate within a low tolerance of tax risk. We recognize that there is always some level of risk on taxation due to:

a. The complexity of taxes including frequent changes in law;
b. The scope for disagreement over the interpretation of laws meaning that tax authorities may take a different view of the application of the legislation; and
c. The variety and volume of different taxes that affect the UK entities' activities.

Operational tax risk

The UK entities' aim is to manage operational tax risks to an acceptable minimum on a cost/benefit basis, recognizing that not all process errors or shortcomings can be eliminated without incurring disproportionate financial cost.

Reputational tax risk

The UK entities rely on their overall commitment to compliance, conservative approach to tax planning and overall low tolerance for tax risk to reduce the potential impact of reputational tax risk.

IV. Commitment to Transparency and Co-operation

We are committed to working with tax authorities, including the HMRC, with honesty, integrity, respect and fairness and in a spirit of co-operative compliance in order to ensure a professional and constructive relationship.

Appendix A

Curtiss-Wright Corporation's group of UK entities includes the following:

DY4 Systems U.K. Ltd – Tax Reference: 204 16385 80700
Curtiss Wright Controls (UK) Ltd – Tax Reference 508 15728 11387
Primagraphics Limited – Tax Reference: 452 51330 05690
Curtiss Wright Flow Control (UK) Ltd – Tax Reference: 508 19997 00966
Component Coating and Repair Services Limited – Tax Reference: 532 58489 14472
Metal Improvement Company, LLC – Tax Reference: 508 40570 05684
Penny & Giles Controls Limited – Tax Reference: 452 15190 10202
Penny & Giles Aerospace Limited – Tax Reference: 9029008231
Primagraphics (Holdings) Limited – Tax Reference: 7684316420
Specialist Electronics Services Limited – Tax Reference: 5738006945