

# **CURTISS-WRIGHT CORPORATION**

## **Policy No. 29**

### **COMPLIANCE WITH GLOBAL TRADE COMPLIANCE LAWS**

**(REVISED APRIL 2015)**

#### **POLICY**

It is the policy of Curtiss-Wright Corporation, its subsidiaries, and affiliates to comply with all applicable global export and import control laws and regulations that may affect the purchase, sale, or shipment of goods, software, or technology, enacted by a country in which Curtiss-Wright operates including without limitation:

- United States export and import control laws and regulations;
- European Union and member country national export and import laws and regulations such as the UK or Ireland;
- Canada export and import control laws and regulations; and
- Any national export and import laws and regulations of countries not members of the European Union such as Switzerland or China.

The types of export/import controls include but are not limited to the following:

- Restrictions on shipping goods, software, or technology exported or re-exported from any country or imported into any country.
- Restrictions on shipping certain products manufactured outside the United States (“US”) that incorporate US origin or US export controlled parts, components, software, or technology.
- Restrictions on the transfer of export controlled technical data (including design information) to certain non-US persons (including employees) whether in the United States or abroad.
- Economic trade sanctions and embargos against certain countries, terrorists, terrorism-sponsoring organizations, or entities involved in the proliferation of weapons of mass destruction.
- Restrictions on the transfer of goods, software, or technology to persons or entities appearing on any applicable government’s list of restricted end-users, or for restricted end-uses.
- Restrictions on the participation in, or support of, foreign boycotts not supported by the United States Government.

US export and import control laws and regulations include, but are not limited to, the Department of Commerce’s Export Administration Regulations (EAR) and Foreign Trade Regulations (FTR), the Department of State’s International Traffic in Arms Regulations (ITAR), the Department of Treasury’s Foreign Asset Controls, the Department of Energy’s Nuclear Regulatory Commission (NRC) Regulations, and the Department of Homeland Security’s (DHS) Customs Regulations as well as other regulations administered by the US government. The European Union laws and regulations include but are not limited to the Council Regulation (EC) no. 1061/2009 for exports and Council Regulation (EC) no. 260/2009 for imports administered by member country organizations. The Canada laws and

regulations include but are not limited to the Canadian Controlled Goods Program administered by the Department of Foreign Affairs, Trade and Development Canada (DFATD).

Common activities that are subject to the global export and import regulations include but are not limited to the following:

- Delivering by any means (shipment or hand carry) finished products, raw materials or other items from one country to another country (or in the case of the European Union, from the European Union to a country outside the European Union);
- Transmission by any means (such as phone calls, email, .ftp) of technology (such as engineering drawings) from one country to another (or in the case of the European Union, from the European Union to a country outside the European Union);
- Under US export control laws and regulations:
  - the transmission of technology to a non-US person within the US or abroad;
  - providing a “Defense Service” to a non-US person within the US or abroad;
  - the re-export by non-US persons of US-origin goods, technology and software and foreign-made products with US-origin content or technology;
  - activities undertaken in other countries by Curtiss-Wright employees who are U.S. citizens or legal permanent residents, depending on the end-uses and end users of the items concerned; and
  - transactions undertaken by non-US subsidiaries or affiliates of Curtiss-Wright that are or would be subject in the ordinary course of business to the review and/or approval of Curtiss-Wright employees who are U.S. citizens or legal permanent residents.

It is the corporate policy of Curtiss-Wright, its subsidiaries, and affiliates worldwide to comply fully with these laws and regulations when exporting or importing products, services and technology. Violations of applicable export and import control laws could result in substantial penalties for both Curtiss-Wright and the individual(s) involved and could potentially jeopardize national security. Penalties could include suspension or denial of Curtiss-Wright’s export privileges, debarment of the company from US Government procurements, heavy fines, and imprisonment.

## **PROCEDURE**

All Curtiss-Wright employees must be familiar with and abide by this Policy. Business Unit Managers are responsible for implementing this Policy. Employees should seek guidance from Global Trade Compliance Group in the Legal Department (1) prior to engaging, directly or indirectly, in any transaction involving controlled exports or re-exports; (2) if they become aware of any potential violation of export or import control compliance; or (3) if they are contacted by the US or any other governments concerning export or import control matters.