

EXPORT AND TRADE COMPLIANCE POLICY

OUR POLICY

As a responsible company in the global marketplace, Brookhouse Aerospace (the "Company") is committed to full compliance with the letter and spirit of the laws and regulations (of the United States, the European Union and all countries in which business is conducted), relating to export and trade controls that apply to the Company as a manufacturer, importer and exporter of (i) physical products, (ii) technology, (iii) technical information and (iv) services.

This responsibility extends beyond exports to re-exports, imports and various activities of both U.S and non U.S persons whilst in the U.S or overseas, which relate to the transfer of (i) physical items, (ii) information and (iii) technology.

Furthermore, this responsibility extends to any Company employee whose tasks and remit of responsibility relate to these type of transfers. The Company expects each employee involved in export and international business matters to comply with all applicable laws and regulations, including but not limited to (i) the Arms Export Control Act (AECA), (ii) the International Traffic in Arms Regulations (ITAR), (iii) the Export Administration Regulations (EAR), (iv) the Foreign Trade Regulations (FTR) and (v) regulations administered by the Office of Foreign Assets Control (OFAC).

Each employee should be made aware that a failure, whether intentional or not, to comply with this policy or any applicable trade law or regulation, could result in disciplinary action up to and including termination, criminal prosecution, the imposition of hefty fines to the individual and the Company, and/or imprisonment. Such violations may also cause the suspension or revocation of the Company's ability to engage in international trade or to transact business with the U.S or foreign Government agencies and subcontractors.

The Company recognizes that effective implementation of this policy requires a robust compliance programme and is fully committed to implementing that.

SPECIFIC RESPONSIBILITIES

Every individual, irrespective of where they are located and whether they are acting personally or on behalf of the Company, is prohibited from engaging in certain conduct which might harm UK, US or other foreign interests.

The parameters of such prohibited conduct are subject to change from time to time, but include the following activities:

1. Engaging in activities with individual persons or entities, or a designated country, to the extent that such activity is subject to trade restrictions imposed by the U.S or foreign Governments. Such restrictions can include

(but are not limited to) sanctions, embargoes and debarments that prohibit the Company from engaging in certain business activities involving prohibited end-use of a (i) controlled commodity, (ii) technology, (iii) technical data or (iv) service or (v) prohibited activity in support of any of the following: (a) Proliferation of Nuclear Weapons, (ii) Chemical or Biological Warfare, (iii) unauthorized sharing of Missile Technology, (iv) acts of Terrorism or (v) support of Terrorist-supporting entities.

2. Exporting, re-exporting or other transfer of a (i) controlled commodity, (ii) technology, (iii) technical data or (iv) service without a license or other required authorization from the appropriate U.K, U.S or Foreign Government.
3. Exporting, re-exporting, or other transfer from one non-U.S. party to another non-U.S. party, of a (i) controlled commodity, (ii) technology, (iii) technical data or (iv) service that is the direct product of controlled U.S origin technology, technical data or service; or in which the controlled U.S. origin content exceeds the maximum thresholds for such controlled content, without a license or other required authorization from the U.S Government.
4. Violating or otherwise circumventing the terms or conditions of a license or other required authorization from the U.K, U.S. or foreign Government.
5. Proceeding with any export or re-export transaction with the knowledge that a violation has occurred or will occur.

CONCLUSION

No policy statement or procedure can address every possible scenario that may arise. Where any situation or transaction arises that is not addressed in the Policy or the Export and Trade Compliance Programme, or in any case of a suspected violation of this Policy or legal requirements, the employee should get in touch with the Legal Department to determine appropriate steps to resolve the matter.