

# TRIMAN INDUSTRIES INC

## **Export Management Policy Statement**

**Date:** 11/13/2009  
**To:** All Employees and Contractors  
**From:** Glenn Bocchetti, General Manager  
**Subject:** Export Compliance Policy Statement

The United States has a statutory and regulatory system for controlling and monitoring the movement of certain goods and technologies. Among other things, the system is designed to minimize the risk of diverting such items to locations which are not in the best interests of the United States.

It is of the utmost importance to Triman Industries that the laws and regulations governing the movement of these goods and technologies be followed. This will allow Triman to maintain its good corporate citizenship status, avoid inadvertent violations, costly errors, and the possible disruption of business.

It is the policy of Triman to fully comply with all laws and regulations governing the export of its products, services and technical data. Each employee, therefore, must be dedicated to ensuring such compliance with government regulations. All sales, service, shipping, quality, accounting and other personnel must be cautious and pay particular attention when releasing technical information to foreign nationals, electronic transmission of data and/or software, and the shipment of products outside the United States.

No transactions are to be conducted by or on behalf of Triman contrary to U.S. export control laws and regulations, including the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR). Under no circumstances shall these laws and regulations be compromised for commercial gain. Neither sales nor shipments are to be made to any country on the Embargoed List, to any individual or firm appearing on any of the Denied Parties Lists, or to any firms owned by or associated with the individuals or firms therein listed.

Many of Triman goods and technologies can be adapted or used for military purposes. Other goods and technologies have both civilian and military applications. Many of these goods and technologies are governed by U.S. export regulations. These regulations are in place to prevent the distribution of goods and technologies that can compromise national security. The regulations are very precise, and compliance with them is mandatory, not voluntary. No employee has the authority to act contrary to this program, nor direct, authorize, or condone violations of the program by any other employee.

It is important to recognize that terms like "classification" and "classified," when used in conjunction with this program, do not refer to military designations for Classified, Secret or Top Secret work. Instead, "classification" in this program is used to describe the process by which Triman identifies the status of work being performed, relative to the ITAR or the EAR. Separate controls and precautions should be taken when handling Classified, Secret or Top Secret work.

Export compliance is a daily exercise. Noncompliance is very costly. All Triman employees are required to comply with any policies and procedures for export control. Any employee who has knowledge of facts or incidents, which he or she believes may violate U.S. export regulations or this program, whether intentional or accidental, is required to report the matter promptly to the General Manager.

Violations of U.S. export laws can subject Triman and its employees to severe penalties, including fines, denial of export privileges, and even imprisonment. Any employee who violates such laws, or who knowingly permits a subordinate to violate such laws, will be subject to appropriate disciplinary action, up to and including termination.

All questions regarding export compliance and how it impacts your job, as well as any question concerning the legitimacy of any transaction, violation, or potential violation should be immediately referred to the General Manager.

The company requests each of you to take this matter very seriously and support Triman in this effort.