



EXPORT COMPLIANCE PROCEDURE

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TABLE OF CONTENTS

Pacific Contours Corporate Compliance Commitment.....	3
EXPORT COMPLIANCE PROCEDURE	
1. Purpose.....	5
2. Scope.....	5
3. Overview of Export Controls.....	5
4. Prohibited End-uses-End-users.....	7
5. Shipper’s Export Declaration.....	8
6. Technology Transfer.....	9
7. Responsibilities.....	13
8. Record Keeping.....	15
9. Penalties and Violations.....	15
Annex A – Red Flags.....	17
Annex B - Reseller Compliance Agreement.....	19
Annex C – Product Matrix.....	21
Annex D- Technology Control Plan.....	22

Pacific Contours Corporate Commitment and Policy

It is the policy of Pacific Contours, Inc, without exception, to fully comply with all export control laws of the United States and the countries where Pacific Contours conducts business. This policy applies to the Company, all of its subsidiaries, and all directors, managers and employees of the Company and its affiliates. Trust, integrity and accountability are critical elements of our culture as an organization. These elements are embodied in the Compliance Program.

The United States maintains a complex set of laws and regulations administered by several different agencies that govern the export and re-export of goods, technology and services from the U.S. In particular, these laws and regulations may require an export license in order to export certain products and technology and/or restrict the export of products or technology to designated destinations, end users and end uses. Please also note that exports include technical exchanges or discussions with non-U.S. nationals (including employees) regardless of their location (even in the U.S.).

Each employee has the principal responsibility for ensuring export compliance in connection with its operations, including dealings with affiliates, consultants, and agents outside of the U.S. Our diligence in making sure our international shipments are handled in accordance with the law is not simply a matter of national interest, but also a matter of Pacific Contours interest, since failure to comply with the regulations could lead to the loss of export privileges and substantial fines.

We cannot afford to jeopardize our ability to serve our overseas customers

The management of Pacific Contours is fully committed to ensuring export compliance and expects every director, manager and employee to share in that commitment. It is the responsibility of each individual employee to be aware of and comply with the U.S. export control laws in performing their jobs. Ignorance or uncertainty about these laws will not be excused. An important part of the Compliance Program is on-going training. The Export Representative will be responsible for maintaining the compliance program, which includes comprehensive and up-to-date training. If you have any question concerning how

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these laws apply to you or any Company activity, please contact the Export Representative for guidance.

Christopher Morgan
Director of Operations
Pacific Contours, Inc
April 10, 2014

1. PURPOSE

The export of certain items, technologies, software and services is regulated for reasons of national security, foreign policy, prevention of the spread of weapons of mass destruction and competitive trade reasons. Prior written authorization (a license) from one or more U.S. government agencies will be required to carry out certain exports of items or technical data and/or services, if an exemption is not available.

2. SCOPE

Exporting is a major contributor to the success of Pacific Contours. It is imperative that every employee, contractor, and sales representative understands and acknowledges the importance of complying with export regulations that govern the exchange of hardware and technical information.

3. OVERVIEW OF EXPORT CONTROLS

The Departments of Commerce, State, and Treasury administer the primary controls on exports of goods or commodities. The Department of Commerce regulates the export of items and information that have civil and dual use applications, the Department of State regulates the export of items that have military applications and the Department of the Treasury enforces country-specific embargoes. In certain circumstances, these agencies may require the Pacific Contours to secure a license before the item or information is exported to another country or shared with a foreign national.

Department of Commerce Controls

The Bureau of Industry and Security (“BIS”) of the U.S. Department of Commerce implements and enforces U.S. export control regulations relating to the export of “dual-use” goods and technologies (having both civil and military applications) as well as exclusively civil items. Items subject to the jurisdiction of BIS are listed on the Commerce Control List (“CCL”) found in the Export Administration Regulations. Whether a license is required to export or reexport an item on the CCL is determined by examining the precise classification of the item, the destination of the item, and

the end-user. BIS also maintains the Denied Persons List and the Entities List, which identify specific persons and entities to which exports are not permitted without the prior approval of BIS.

Department of State Controls

The Directorate of Defense Trade Controls (“DDTC”) of the U.S. Department of State regulates the export of defense goods, technical data, and defense services. DDTC administers the International Traffic in Arms Regulations (“ITAR”).

Generally, a defense article is an item developed for a military application that does not have a predominant civilian application. Unless an exemption applies, a license must be obtained before any defense article is exported to a foreign country or foreign national. Authorization by DDTC is also required for any agreement under which a U.S. person will furnish assistance to foreign persons in the development, design, production or use of a defense article or under which a U.S. person will license to a foreign party the right to manufacture U.S.-origin defense articles abroad. DDTC maintains a list of “debarred” persons and entities whose exporting privileges have been revoked as a consequence of violations of the ITAR.

Department of Treasury Controls

The Office of Foreign Assets Control (“OFAC”) of the U.S. Department of Treasury administers and enforces certain country-specific controls that take the form of economic embargoes against countries, including to date, ***Cuba, Iran, North Korea, Sudan and Syria***. The scope of these economic and trade embargoes varies from country to country. OFAC has adopted regulations that detail the scope of the embargo against each country. New sanctions were recently imposed against Syria, and restrictions on trade with Iraq and Libya have been significantly reduced.

OFAC also maintains lists of Specially Designated Terrorists and Specially Designated Nationals and Blocked Persons, with whom U.S. persons are prohibited from engaging in any transactions due to U.S. foreign policy and national security concerns. Transfers of items and information to individuals or entities on these lists are prohibited without the prior approval of OFAC.

Deemed Exports

In addition to regulating the export of actual goods or commodities, U.S. export controls cover the export or release of “technical data” or technology (which includes information, whether printed, inscribed on media, or communicated orally). The release of such information is called a “deemed export.” Under the deemed export rule, the transfer or release of technical data or information

subject to U.S. export controls to a “foreign national,” whether it occurs in the United States or abroad, is “deemed” an export from the United States to the home country of the foreign national.

4. PROHIBITED END USES AND END-USERS

Before exporting material or data to an individual entity, you should check the lists identified in the Bureau of Industry and Security consolidated screening list at: https://www.bis.doc.gov/urlmessages/consolidated_list_hp.html.

If the intended recipient appears on one of those lists, it is very likely that you would not be able to send the item to the intended recipient without, at a minimum, a license.

Currently, several countries are subject to at least some level of sanctions pursuant to regulations administered by the U.S. Department of the Treasury, Office of Foreign Assets Controls (“OFAC”). Because the list of countries subject to OFAC sanctions frequently changes, you should check the following link for the current list of countries: <http://www.ustreas.gov/offices/enforcement/ofac/>. It is Pacific Contours policy to comply with all requirements for transactions with individuals on any of the lists of prohibited end-users as well as the countries that are subject to U.S. unilateral or multilateral sanctions or embargoes.

Prohibited end-uses

The EAR prohibits U.S. persons from exporting goods, software, and technology with the “knowledge” that such items could contribute to the proliferation of weapons of mass destruction. Additional details about nuclear end-use controls, missile technology end-use controls, and chemical and biological weapons end-use controls can be found at Part 744 of the EAR. Guidance as to what constitutes “knowledge” of these restricted end-uses can be found under the “Know Your Customer” Guidance and Red Flags found in Supplement No. 3 to Part 732 of the EAR. The Red Flags are also listed in Annex A. If a project raises any red flags, then the Pacific Contours official contemplating engaging in the project shall contact the export compliance representative.

In compliance with General Prohibition 5 of the EAR, no shipment may be exported without a license (or reviewed by the BIS) if it is known that the end user is involved in the following:

- Any nuclear activities involving, but not limited to, research, development,

design, manufacture, construction, or testing of any device, facility, or component thereof. This may include item on the CCL that can be shipped NLR or under a license exception or EAR99

- Any missile end-uses involving the design, development, or production of missiles in or

By a country listed in Country Group D:4 (Supplement No. I to Part 740 of the EAR). This applies even if the listed activity does not appear on the CCL

- Any prohibited chemical and biological weapons end-uses including design, development and production or stockpiling

5. SHIPPER'S EXPORT DECLARATION AND DESTINATION CONTROL STATEMENT

In addition to export control laws and regulations, it is Pacific Contours policy to comply with other requirements associated with exports of items or technology, including the filing of Shipper's Export Declarations ("SEDs"), when necessary, and Destination Control Statements.

If the item you are shipping has a value of more than \$2500, you will need to file an SED. This information frequently is on the international air waybills for commercial shippers such as Federal Express, DHL, UPS, and these common carriers will generally prompt you to fill out the appropriate form. For assistance in filling out an SED, refer to <http://www.census.gov/foreign-trade/regulations/forms/index.html>, which will walk you through the process.

To determine the value in U.S. dollars, enter the selling price or cost if not sold, including freight, insurance, and other charges to U.S. port of export, but excluding unconditional discounts and commissions (nearest whole dollar, omit cents). The value to be reported on the SED is the exporter's price or cost if not sold, to the foreign party.

If there is an intellectual property agreement associated with the item to be exported, the value to be reported will depend on whether to value the item as the full cost of the agreement or whether the cost of the agreement is for the services and intellectual property associated with the item, and the cost for the actual item is some subset of the total price of the agreement. The exact valuation will depend on the facts of the individual transfers.

Destination Control Statements

If the export is subject to the EAR, and is on the Commerce Control List and thus not classified as EAR99, the invoice and the bill of lading, air waybill, or other export- control document that accompanies the shipment from its point of origin in the United States to the ultimate consignee or end-user abroad must, at a minimum, contain the following Destination Control Statement, as required under 15 C.F.R. § 758.6:

“These commodities, technology or software were exported from the United States in accordance with the Export Administration Regulations. Diversion contrary to U.S. law is prohibited.”

If the export is subject to ITAR, the bill of lading, invoice, and license must include the following, as required under 22 CFR 123.9:

“These commodities are authorized by the U.S. Government for export only to (country of ultimate destination) for end-use by (end-user). They may not be transferred, transshipped on a continuous voyage, or otherwise disposed of in any other country, either in their original form or after being incorporated into other end-items, without prior written approval of the U.S. Department of State.”

6. TECHNOLOGY TRANSFER

Under the EAR and the ITAR, a “deemed” export takes place any time the company releases technology to a foreign national, whether it takes place in the U.S. or abroad. Technology is specific information necessary for the “development”, “production” or “use” of a product. Technology is “released” for export when it is available to foreign nationals for visual inspection (such as reading technical specifications, plans, blueprints, etc.); when it is exchanged orally; or when it is made available by practice or application under the guidance of persons with knowledge of the technology.

The transfer of technology can be accomplished by various means. To ensure that the transfer of technical data does not take place unless the proper compliance checks have been conducted and the appropriate individual validated license (IVL) or license exception is in place, the following guidance is provided:

A. Hiring Foreign Nationals

Human Resources in conjunction with the Export Compliance Representative will coordinate with the Project Managers to determine if the "non-permanent resident" requires Pacific
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Contours to submit an IVL request to the Department of Commerce or State prior to the hiring of said individual. If the foreign national can be hired under a "license exception," completion of Pacific Contours nondisclosure statement and/or Letter of Assurance would be required. If it is determined that an IVL is required, the Export Compliance Representative will submit an IVL to the Department of Commerce or Department of State. Human Resources will notify the appropriate Manager not to allow the foreign national to commence work on the "controlled" products at Pacific Contours until an IVL has been issued.

TECHNOLOGY TRANSFER – Continued

B. Plant Visits

Anyone sponsoring a plant visit, training etc. that will include foreign nationals must notify the Export Compliance Representative prior to the visit. The Export Compliance Representative will run the appropriate compliance check, screen parties against entity list and make copies of passports.

C. VISA Sponsor Letters

Pacific Contours welcomes all foreign national visitors and encourages international exchange, but must ensure that all appropriate safeguards are in place to protect the security of the Company and the export compliance program prior to issuing any sponsor letters. All sponsor letters should be:

- Person specific (e.g. name, date of birth, place of birth, and passport number);
- Site specific (e.g. the office being visited);
- Date specific (critical- sponsor letters should never be open-ended);
- Clear about the purpose of the visit.

It is important to keep track of foreign national visits, because there are export related issues dealing with access to “technical data”. All foreign national visitors **must** sign the visitor’s log prior to entering a facility. Copies of all sponsor letters **MUST** be sent to the Export Compliance Representative. Any deviation from either the visa or sponsor letter requires immediate notification to the Export Compliance Representative.

D. Transmission of Company Proprietary Technical Data

Transmission of Company proprietary technical data internationally is deemed an export and therefore is subject to the "Export Laws" of the U.S. Prior to distributing such information in any of the modes described below, the compliance review checks are to be conducted by the Export Compliance Representative.

Modes of Distribution:

- Courier of documents
- Electronic transmission (memo to file by party transmitting information)
- Mailings
- Hand carries

Compliance Review Checks:

- Determine license-ability to end destination (license exception vs. validated license)
- End User check against the latest Restricted Party List (RPL) via BIS Consolidated Screening site.

E. Visiting Foreign Countries

The following is the procedure to be implemented for all hand-carries of Pacific Contours manufactured products or other Pacific Contours property exported from the U.S.

The purpose is to provide export procedures and guidelines relative to Export Controls and recordkeeping requirements for the hand-carry of U.S. origin commodities or U.S. controlled products internationally; (products, technical data). These procedures and guidelines ensure that all transactions are made in compliance with the EAR and/or ITAR. Pacific Contours employees or visitors, wishing to hand carry for export purposes any commodities or technical data must first notify the Export Compliance Representative. The following information must be provided:

- Product/Technology to be hand-carried (generic technical description).
- Value of hand-carry items.
- Country of origin of commodities.
- The usage of hand-carried commodities.
- Date of departure.
- Name of carrier.
- Port of export.
- Destination country
- Entity or person who will have custody of the product.
- Will products be returned?
- When?

7. RESPONSIBILITIES

Responsibility: Management

- Disseminate to all employees the Pacific Contours Export Compliance Procedure
- Provide relevant export procedures, organizational structure and resource to support the Policy
- Maintain permanent record of all export licenses issued.
- Provide objectives for all employees to support all export laws, rules and regulations
- Assign responsibility in support of the Export Policy
- Support a continuing education program and provide tools required in order to be in compliance
- And full understanding of changing export laws, rules and regulations

Responsibilities: Export Control Representative

- Submit license request for restricted or controlled activities to federal agencies
- Determine eligibility for license exceptions
- Conduct inquiries to export activities
- Act as liaison to federal agencies
- Provide for central record keeping and retention
- Screen exports against embargoed list of countries, denied parties and entity list
- Update and send notice advising of the Blacklist and Country Embargo list to Executive, Sales, Supply Chain, and CSR personnel quarterly i.e. Jan, April, July and October.

Responsibilities: Human Resources

- Screen all visitors against Restricted Parties List
- Determine whether the visitor will require access to controlled data or articles and inquire about nationality as needed to satisfy export control requirements, apply for license as needed
- Determine if foreign national employees require access to controlled technical data and if so apply for license as needed or license exception

Responsibilities: Procurement

- When purchasing items, Pacific Contours shall request that vendors provide technical specifications sheets and the Department of Commerce ECCN or Department of State's

USML classification number.

Responsibilities: Sales/Marketing

- Ensure customer is aware of possible end-user/end-use limitations and retransfer or reexport restrictions
- Ensure controlled technical data is not disseminated to potential customers without first appropriate authorizations
- If exporting controlled articles or technical data for trade show or other demonstration purposes ensure you plan ahead and garner the appropriate exemption and/or license.

Responsibilities: Engineering

- Be aware of export controls on technical data and defense services in all you do
- When using existing drawings/specifications as a starting point for a new product, understand the export classification of the initial data and if modifications occur the new classification for drawings or specifications
- Assist with product classifications
- Identify and mark controlled technical data

Responsibilities: IT

- Ensure controlled technical data is not accessible to unauthorized parties.
- Fulfill and implement Technology Control Plan such as restricting access or securing controlled data from unauthorized foreign nationals.

Responsibilities: Shipping

- Ensure you are aware of export classification and export license requirements for all items to be shipped from the Company
- Coordinate with Export Control Representative as necessary
- For controlled goods, confirm a valid license or exemption authorization for the shipment
- For exports of technical data ensure adequate information is provided in export documentation
- Ensure proper destination control statement is included in shipping documentation for controlled goods and/or technology.
- Do not release shipments that lack proper export authorization

8. RECORDKEEPING

The Export Administration Regulations (EAR) and regulations of other agencies involved in exports require that complete and accurate records be maintained relating to all export transactions. The Export Representative is responsible for maintaining files containing such "export records".

A. Records to be maintained

The records to be maintained in connection with each U.S. export (including re-exports) include any written material relating to the export - such as export applications and licenses, end-use statements, import certificates, or documentation of the information provided to the forwarder for AES submission, air/ocean waybills, purchase orders, sales orders and contracts, invoices, receipts, letters of credit, memos and notes, telephone logs, and correspondence. A complete list of the documents required to be maintained is set forth at §762.7 of the EAR.

B. How Long to Maintain Records

The EAR/ITAR requires that export records be retained for **five (5) years** from the date of the export, re-export, or any other termination of the transaction as defined in §762.6 of the EAR

Accordingly, Pacific Contours will maintain export records for this minimum period of five (5) years. Records must be kept longer if required by applicable regulations or laws.

C. Location of Records

The Export Representative is responsible for ensuring that its export records are properly maintained. Records related to ongoing transactions should be located on-site in an appropriate location. Any records stored off-site should be retrievable within a reasonable time - such as no more than 48 hours. All export records should be in good order and readily available for inspection

9. PENALTIES AND VIOLATIONS

In the event of a violation of U.S. export control law, both the company and the individuals involved in the violation may be liable. The exporter and the individual employees involved may be subject to severe administrative and civil sanctions as well as criminal penalties. For example, "knowing" violations of the EAR are punishable by a fine of up to five times the value of the

exports involved, or \$50,000, whichever is greater. “Willful” violations can result in penalties of up to \$1 million per violation. Exports are subject to a strict liability standard, so even negligent exports can trigger fines of \$10,000 to \$120,000 per violation. In addition to fines, individuals may be imprisoned for intentional violations. Penalties can also include the denial of export privileges and debarment from contracting with the federal government. Almost all enforcement actions are public.

Annex A: “Red Flags” Indicating Possible Diversion

Note: Some indicators may not be relevant depending on the technology for export

- The recipient or its address is similar to one of the parties found on the Commerce Department’s Bureau of Industry and Security’s list of denied persons.
- The recipient or agent is reluctant to offer information about the end-use of the item.
- The product’s capabilities do not fit the recipient’s line of business, such as an order for sophisticated computers for a small bakery.
- The goods, software or technology sought is incompatible with the technical level of the country to which it is being shipped, such as semiconductor manufacturing equipment being shipped to a country that has no electronics industry.
- The recipient is willing to pay cash for a very expensive item when the terms of sale would normally call for payments over time.
- The recipient has little or no background in the field associated with the export.
- The recipient is unfamiliar with the product’s performance characteristics but still wants the product.
- Routine installation, training, or maintenance services are declined by the recipient.
- Delivery dates are vague, or deliveries are planned for out of the way destinations.

- A freight forwarding firm is listed as the export's final destination.
- The shipping route is abnormal for the product and destination.
- Packaging is inconsistent with the stated method of shipment or destination.
- When questioned, the recipient is evasive and especially unclear about whether the purchased product is for domestic use, for export, or for reexport.

Annex B - Resellers Compliance Agreement

(Date)

(Name of Reseller)

Subject: **U.S. Re-Export Regulatory Compliance**

We at (Company) are pleased to have you as a distributor/reseller of our products. As a business partner of (Company) we are providing this letter to reiterate to you some of the requirements of our business relationship. These requirements are an integral part of the corporate policy of (Company) which mandates full compliance with the U.S. Export Administration Regulations, (EAR), and with all other U.S. Government regulations. Your careful attention to complying with these requirements is, therefore, requested and appreciated.

Pursuant to the corporate policy of (Company), under no circumstances will a sale, export or re-export transaction be made contrary to the U.S. Export Administration Regulations, (EAR), and/or all other applicable U.S. export regulations. That is,

1. No sale or resale of U.S. products, are to be made to any individual or entity listed on the U.S. Sanctioned Parties Lists without prior approval from the U.S. Government. This Sanctioned Parties Lists is comprised of the following: the Denied Persons List, the Entities List, and the Specially Designated Nationals List.

<http://www.bis.doc.gov/complianceandenforcement/ListsToCheck.htm>

2. No sale or resale of U.S. products is to be made to any country subject to a U.S. trade sanction (embargo) without prior approval from the U.S. Government and/or (Company).

3. The end use of U.S. products for direct/indirect use in any nuclear/missile technology,

chemical or biological application maybe controlled by U.S. export regulations and should be reviewed by (Company) prior to any sale. (Company) requests that our selling partners comply with this established company policy for all sales of (Company) products. If you are unfamiliar with a customer or the customer's business practices, we ask that you check the web site listed below to verify that the sale is not made to a party on any of the U.S. Sanctioned Parties Lists. Please be advised that (Company) performs a 100% check against these lists prior to processing any order. Any order that is in question may be held for additional documentation prior to shipment, and/or may not be accepted.

Annex C: Product Matrix

Item	Classification	Description	Jurisdiction	Controls	Approval
Technical Drawings for end-use Boeing CH-47 Chinook helicopter underfloor frame	VIII(i)	Aircraft and Associated Parts (i) Technical data and defense services directly related to defense articles enumerated in Category VIII (a)-(h)	Department of State	All countries unless exemption applies	Authority to share technical data with Australian companies Ferra Engineering and Lovitt Technologies for a period of 48 months. License Number: 050503941, 050503942

*"SPECIALLY DESIGNED": As a result of development has properties peculiarly responsible for achieving or exceeding the performance levels, characteristics or functions in the relevant ECCN or USML paragraph; or

Is a part, component, accessory, attachment or software for use in or with a commodity or defense article, enumerated or otherwise described on the CCL or the USML. (certain exclusions apply)

Annex D: Technology Control Plan

Scope: The procedures contained in this plan apply to all elements of the _____ (insert company name and address). Disclosure of unclassified and/or classified information to foreign persons in a visitor status or in the course of their employment by _____ (insert company name) is considered an export disclosure under the International Traffic in Arms Regulations (ITAR) and requires a licensing by the Department of State.

Purpose: To delineate and inform employees and visitors of _____ (insert company name) the controls necessary to ensure that no transfer of technical information or data or a defense service (as defined in ITAR paragraphs §120.10 & §120.9) occurs unless authorized by the Directorate of Defense Trade Controls (DDTC).

Background: _____ (insert company name) _____ (explain the products and services the company provide (e.g., designs, manufactures, integrates...)). Reference customers it provides products and/or services to (including foreign customers).

Foreign Persons: No foreign person will be given access to unclassified and/or classified material on any project or program that involves the disclosure of technical data as defined in ITAR paragraph 120.10 until that individual's license authority has been approved by the Office of Defense Trade Controls Licensing (DTCL).

_____ (insert company name) employees who have supervisory responsibilities for foreign persons must receive an export control/licensing briefing that addresses relevant ITAR requirements as they pertain to classified and controlled unclassified information.

Foreign Persons

- Foreign persons employed by, assigned to (extended visit) or visiting _____ (insert name of company), shall receive a briefing that addresses the following items:

- Prior to the release of classified material or controlled unclassified information to a foreign person an export authorization issued by DTCL needs to be obtained by _____ (insert company

name).

- Ensure foreign persons adhere to the _____'s (insert company name) security rules, policies and procedures and in-plant personnel regulations.
- Outline the specific information that has been authorized for release to them.
- Address the _____'s (insert name of the company) in-plant regulations for the use of facsimile, automated information systems and reproduction machines.
- Any classified information they are authorized to have access and need to forward overseas will be submitted to the _____'s (insert company name) security department for transmission through government-to-government channels.
- Information received at _____ (insert company name) for the foreign national and information that the foreign national needs to forward from _____ (insert company name) shall be prepared in English.
- Violations of security procedures and in-plant regulations committed by foreign nationals are subject to _____ (insert company name) sanctions.

Access Controls for Foreign Nationals: Address how foreign nationals will be controlled within the company's premises, for example:

- a. Badges: (if necessary, address procedures, e.g., composition of the badge, identification on badge that conveys that the individual is a foreign national, privileges and so forth).
- b. Escorts: (if necessary, address escort procedures. (NOTE: _____ (insert name of company) supervisors of foreign persons shall ensure that foreign nationals are escorted in accordance with U.S. Government and _____ (insert name of company) regulations.
- c. Establishment of a segregated work area(s). If necessary.

Export Controlled Information: List specific elements of export controlled information, both classified and unclassified, that can be disclosed to foreign nationals and the program(s) the foreign national is supporting

Non-Disclosure Statement

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All foreign persons shall sign a non-disclosure statement that acknowledges that classified and controlled unclassified information will not be further disclosed, exported or transmitted by the individual to any foreign national or foreign country unless DDTC authorizes such a disclosure and the receiving party is appropriately cleared in accordance with its government's personnel security system.

Supervisory Responsibilities: Supervisors of cleared personnel and foreign national employees and foreign national visitors shall ensure that the employees and visitors are informed of and cognizant of the following:

- Technical data or defense services that require an export authorization is not transmitted, shipped, mailed, hand-carried (or any other means of transmission) unless an export authorization has already been obtained by _____ (insert company name) and the transmission procedures follows U. S. Government regulations.
- Individuals are cognizant of all regulations concerning the handling and safeguarding of classified information and controlled unclassified information. (NOTE: Companies may also want to address company propriety and other types of unclassified information that require mandated controls.
- Individuals execute a technology control plan (TCP) briefing form acknowledging that they have received a copy of the TCP and were briefed on the contents of the plan (Attachment B).
- U.S. citizen employees are knowledgeable of the information that can be disclosed or accessed by foreign nationals.

Employee Responsibilities: All _____ (insert name of company) employees who interface with foreign nationals shall receive a copy of the TCP and a briefing that addresses the following:

- Documents under their jurisdiction that contain technical data are not released to or accessed by any employee, visitor, or subcontractor who is a foreign national unless an export authorization has been obtained by _____(insert company name) in accordance with the ITAR or the Export Administration Regulations (EAR).
- If there is any question as to whether or not an export authorization is required, contact the Export E

Compliance Representative promptly.

- Technical information or defense services cannot be forwarded or provided to a foreign national regardless of the foreign national's location unless an export authorization has been approved by DDTC and issued to _____ (insert company's name).

Acknowledge by:

{Name, Title, Date}

{Name of Company}

