

<b><i>EAST PENN MANUFACTURING CO., INC.</i></b>			
<b>EAST PENN POLICIES AND PROCEDURES MANUAL</b>			
Revision No.:	Effective Date:	Page 1 of 1	Change #
Approved By: Robert D. Harrop		Document No.: EPPM\PERSON	

## **ITAR (International Traffic in Arms Regulations)**

There are several government agencies that have laws and regulations relating to exports and imports of commodities and technologies. The Company's products or technologies that are designed and produced for commercial applications and have not been modified for a military application fall under the jurisdiction of the EAR. Products or technologies that have been specifically designed or modified for a military application or for an application that is defined with the ITAR, specifically the United States Munitions List (USML), fall within the jurisdiction of the ITAR. To prevent unauthorized exports, it is crucial that all Employees are made aware of the regulations and maintain strict compliance to the various laws and regulations cited within. Under no circumstances will exports be made contrary to U.S. export control regulations. It is the responsibility of all Company Employees to contact an Empowered Official for assistance with any questions concerning the applicability of U.S. export controls to a specific transaction, the legitimacy of a sale, the parties involved, or any activity relating to foreign persons, regardless of whether the activity is happening in the United States or abroad.

Employee represents that he/she will comply with all applicable export and import laws and regulations during their employment, including but not limited to, the U.S. Arms Export Control Act, as amended (22 U.S.C. §§ 2751-2799), the International Traffic in Arms Regulations ("ITAR"), as amended, (22 C.F.R. Part 120 et seq.), the Export Administration Act, as amended, (50 U.S.C. §§ 2401-2420), and the U.S. Export Administration Regulations ("EAR"), as amended (15 C.F.R. § 730 et seq.). The parties shall not export, disclose, furnish or otherwise provide any article, technical data, technology, defense service or technical assistance of the other party to any foreign person or entity, whether within the U.S. or abroad, without obtaining, in advance, appropriate authorization from an Empowered Official. Failure to abide by the export policies set out in this policy can result in disciplinary action up to and including termination of employment. It is critical that all Employees' report possible violations of U.S. export control laws immediately to their manager and an Empowered Official.

### **Record of Revisions**

<b>Revision #</b>	<b>Revision Date</b>	<b>Description</b>