

HAWKER PACIFIC AEROSPACE

TECHNICAL DATA EXPORT CONTROL POLICY AND PROCEDURE

Hawker Pacific Aerospace (“Company”) policy requires strict compliance with applicable export control regulations of the United States of America. These requirements apply to the management and dissemination of all technical data, including specifications, blueprints, drawings, bills of material, and operating instructions (“Technical Data”) related to any product designed, manufactured, remanufactured, modified by, or otherwise in the possession of, the Company.

1. All Technical Data are subject to the export control regulations of the United States of America. ***Under no circumstances may Technical Data be transferred, re-exported, or placed in the custody of any person or organization contrary to applicable regulations.***

2. All Technical Data transmitted from the United States of America to other countries or nationals of other countries, irrespective of their physical location, are subject either to the U.S. Export Administration Regulations or the U.S. International Traffic in Arms Regulations, and all communications accompanying Technical Data and export control documents (invoices, bills of lading, etc.) shall bear the appropriate regulatory designation and destination control statement when transmitted by the Company from the United States, plus a link to the Company’s website statement of this Policy, as follows:

EAR: (15 CFR § 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.” See [link]

ITAR: (22 CFR § 123.9) “These commodities are authorized by the U.S. Government for export only to _____ (country) for use by _____ (End User) . They may not be transferred, transshipped on a non-continuous voyage, or otherwise be disposed of in any other country, either in the original form or after being incorporated into other end-items, without the prior written approval of the U.S. Department of State.” See [link]

3. ***No Technical Data may be transferred by any Company employee to any individual or organization, regardless of location or nationality, who is not a full or part-time employee, consultant, or export-approved vendor or customer of the Company, without the prior written approval of the Empowered Official of the Company.***

4. ***No Technical Data may be transferred by any Company employee to any organization, or an employee of an organization other than the Company, or any of its full or part-time employees or consultants, who are located in or nationals (either sole or dual) of any of the Countries of Concern named in the Countries of Concern Reference Table, without the prior written approval of the Empowered Official of the Company.*** If doubt exists regarding the applicability of this restriction in any given instance, refer to the Empowered Official.

**COUNTRIES OF CONCERN
REFERENCE TABLE**

Afghanistan
Belarus
Burma (Myanmar)
China (PRC)
Congo Democratic Republic
Congo, Republic of
Cote d'Ivoire (Ivory Coast)
Cuba
Cyprus
Eritrea
Fiji
Guatemala
Haiti
Iran
Iraq
Lebanon
Liberia
Libya
Macau (see China)
North Korea
Palestine
Sierra Leone
Somalia
Sri Lanka
Sudan
Syria
Venezuela
Vietnam
Yemen