

Auxitrol Weston (Auxitrol SAS, Weston Aerospace Ltd, Norwich Aero Products Inc and subsidiaries) is committed to full compliance with the letter and spirit of the laws and regulations of the United States, the European Union, the United Kingdom (UK) and all countries in which business is conducted. It is the policy of Auxitrol Weston to abide by all applicable laws and regulations. Under no circumstances shall compliance be compromised for commercial gain.

Why is Trade Compliance Important ?

The purpose of trade compliance controls is to limit the supply of technology or strategic goods to countries proscribed. This is for reasons of proliferation, security, or terrorism. It is in the interest of us all that the controls are effective if it makes the world a safer place. If items are on the strategic export control list, there are concerns about the end user or the end use or the items are intended for destinations subject to sanctions, then restrictions may apply, and an export license may be required. Particular attention should be applied where items are subject to export control and are destined for military end use in an embargoed destination or for purposes related to Weapons of Mass Destruction (WMD).

Trade compliance applies to all exports, re-exports, transfers, procurement, services or importation of all commodities, technology and services from and to all countries where Auxitrol Weston conducts business. We must not dispatch any items without due clearance and authorization. The success of this company depends in large part on the business we do overseas. This include not only physical shipments but also the release of technology, including to foreign nationals domestically or abroad. Export controls imposed by the governments where we do business affect a high proportion of our products and many of our overseas markets. We must understand the controls and be quite sure we follow them.

How do we comply ?

In accordance with the code of business conduct and ethics, it is the policy of Auxitrol Weston to comply with all applicable laws and regulations that operate to restrict the use of and access to Controlled Information, Goods, and Technology for reasons of national security or protection of trade in the countries in which we operate. Applicable laws include those of the United States, France, UK, Mexico, Singapore and in all countries where we do business.

To ensure compliance with these laws and regulations TransDigm's International Trade Compliance (ITC) organization provides each subsidiary location, with overall policies and procedures to support compliance. These procedures must be followed for all exports and imports of Goods, Software, Technical Data or Technology, and Defense Services. The persons responsible for administering this program will be provided the necessary support to maintain compliance.

What is the Impact of non-compliance ?

Administrative, civil, and criminal penalties exist for violations of trade compliance controls. Violations can result in fines, loss of export or import privileges, and imprisonment if violations are found to be willful and intentional. In addition, violation of these laws could adversely affect the ability of Auxitrol Weston to conduct its normal business.

How can I contribute?

All Auxitrol Weston's employees are responsible to ensure their activities are conducted in full compliance with the Trade Compliance Program. We must comply with the legislation. Failure to do so would bring serious penalties for the company.

If any employee has reason to believe that any export or re-export may be destined for an inappropriate end-use, end-user, or destination or may be made in violation of applicable regulatory requirements, such person shall halt the transaction and contact the local Trade Compliance office for further due diligence. We therefore ask every employee to ensure that, under no circumstances, should a transaction occur contrary to Auxitrol Weston's policy of full compliance.

To confidentially report illegal or unethical behavior, without fear of retaliation, employees can speak with their supervisor or manager, they can also speak with HR, a member of Senior Staff or to the President of Auxitrol Weston. Employees can also refer to the company Whistleblower Policy that can be found on TransDigm's website (www.transdigm.com) under « Investors » / « Corporate Governance ».



Nicolas Guichard
President