

Penn Engineering Components, Inc. designs and manufactures precision waveguide components for defense, aerospace, and space programs, and is registered with the U.S. Department of State under the International Traffic in Arms Regulations (ITAR). We are committed to full compliance with all applicable U.S. export control laws and regulations, including the ITAR (22 CFR Parts 120–130) and, where applicable, the Export Administration Regulations (EAR, 15 CFR Parts 730–774).

This policy is fulfilled through:

- Maintaining current registration under the ITAR and renewing that registration as required.
- Classifying products, technical data, and services prior to export or disclosure to determine applicable jurisdiction, classification, and licensing requirements.
- Screening customers, partners, and other transaction parties against denied/restricted party lists prior to engaging in a transaction.
- Verifying and maintaining required export licenses, agreements, or applicable exemptions prior to any export or transfer of controlled hardware or technical data.
- Controlling access to export-controlled technical data on a need-to-know basis, including physical and information security safeguards.
- Prohibiting the unauthorized transfer, including "deemed export," of controlled technical data to foreign persons absent a required license, agreement, or applicable exemption.
- Training employees whose roles involve engineering, program management, shipping, or procurement on their export compliance obligations.
- Reporting and remediating any identified export compliance concerns in accordance with applicable regulations.

This policy applies to all Penn Engineering Components, Inc. personnel and is administered under the direction of our designated Empowered Official.

[Signature]

Empowered Official: *[Name, Title]*

Penn Engineering Components, Inc.

Effective Date: *[Effective Date]*

Last Reviewed: *[Last Reviewed Date]*