

EXPORT COMPLIANCE POLICY

It is the policy of AirBorn, Inc. to adhere to and comply with all U.S. Government laws and regulations in respect to exports from the United States or re-exports worldwide. AirBorn, Inc. is firmly committed to adhering to all Export Control Laws and regulations promulgated and administered by agencies of the United States Government including without limitations the Arms Export Control Act (AECA), the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR).

To insure compliance with these laws and regulations, AirBorn provides all employees with procedures, training and copies of the applicable regulations and reference material. These procedures must be followed for all exports or re-exports of defense articles, technical data, defense services, commodities, technology or software handled by AirBorn, Inc.

Administrative, civil and criminal penalties exist for violations of Export Control Laws. Violations of these laws and regulations can result in fines, loss of employment or imprisonment if violations are found to be willful and intentional. In addition, violation of these laws could adversely affect the ability of AirBorn, Inc. to conduct its normal businesses. Therefore, compliance is considered a top priority and the responsibility of all employees. Internal audits will be conducted on a regular basis to insure all operations are in full compliance with Export Control Laws. Questions concerning export control regulations and compliance matters should be addressed to Donna Logan, Regulatory Compliance Manager, who can be reached by telephone at (972) 931-2903 or via email at logand@airborn.com or Chris Wegmann, Chief Compliance Officer, who can be reached by telephone at (972) 931-2898 or via email at wegmannc@airborn.com.

- AirBorn is a Texas Corporation incorporated to do business in the U.S.
- AirBorn is registered with DDTC and this registration is renewed each year with expiration date of July 31st.
- AirBorn employees who will have access to Export Controlled Technical Data or Defense Articles have been advised of their obligations regarding compliance with export control regulations.
- AirBorn will comply with all applicable U.S. Government export control laws and regulations before:
 - (a) Disclosing Export Controlled Technical Data or Defense Articles to any person who is not a U.S. person; or
 - (b) Providing any person who is not a U.S. person with access to Export Controlled Technical Data or Defense Articles; or
 - (c) Assigning any person who is not a U.S. person to perform work which requires access to Export Controlled Technical Data or Defense Articles.
- AirBorn agrees that it is responsible for ensuring that the export requirements cited herein are also conveyed to all sub-tier suppliers that may have access to Export Controlled Technical Data or Defense Articles.
- AirBorn properly marks all ITAR and EAR technical data with the proper diversionary clause.